

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division

GAVIN GRIMM,

Plaintiff,

v.

Case No. 4:15-cv-54

GLOUCESTER COUNTY SCHOOL
BOARD,

Defendant.

**GLOUCESTER COUNTY SCHOOL BOARD AND GAVIN GRIMM'S JOINT MOTION
TO STAY ALL PROCEEDINGS IN THIS CASE PENDING APPEAL AND FOR AN
EXTENSION OF TIME FOR THE SCHOOL BOARD TO FILE AN ANSWER TO
GRIMM'S AMENDED COMPLAINT**

NOW COME the Defendant Gloucester County School Board (“School Board”) and the Plaintiff Gavin Grimm (“Grimm”), by counsel, and jointly move this Court to stay the proceedings in this case, including the School Board’s filing of an Answer to the Amended Complaint, pending this Court’s ruling on the School Board’s Consent Motion to Certify and any subsequent ruling made by the Fourth Circuit related to the School Board’s interlocutory appeal. Both parties rely upon and incorporate their Brief in Support of this Joint Motion as if fully set forth herein.

WHEREFORE, both parties, jointly and by counsel, request that this Court GRANT their Motion to Stay and STAY all proceedings in this case.

**GLOUCESTER COUNTY SCHOOL
BOARD**

By Counsel

/s/

David P. Corrigan (VSB No. 26341)
Jeremy D. Capps (VSB No. 43909)
Douglas E. Pittman (VSB No. 87915)
Attorneys for Gloucester County School Board
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com
jcapps@hccw.com
dpittman@hccw.com

CERTIFICATE

I hereby certify that on the 4th day of June 2018, I filed a copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send a Notice of Electronic Filing to all counsel of record.

Claire G. Gastañaga
American Civil Liberties Union of Virginia Foundation, Inc.
701 E. Franklin Street, Suite 1412
Richmond, VA 23219
804-644-8080 - Phone
804-649-2733 - Fax
claire@acluva.org

Joshua A. Block, Esq. (Pro hac vice)
Leslie Cooper, Esq. (Pro hac vice)
American Civil Liberties Union
125 Broad Street, 18th Floor
New York, NY 10004
212-549-2627 - Phone
212-549-2650 – Fax
jblock@aclu.org
lcooper@aclu.org

Clare P. Wuerker, Esq.
VSB 79236
United States Attorney's Office
101 West Main Street
Suite 8000
Norfolk, VA 23510
757-441-6331 - Phone

757-441-6689 – Fax
Claire.Wuerker@usdoj.gov

Victoria Lill, Esq. (Pro hac vice)
United States Department of Justice
950 Pennsylvania Ave., N.W.
Educational Opportunities Section, PHB
Washington, DC 20530
202-514-4092 - Phone
202-514-8337 - Fax
Victoria.Lill@usdoj.gov

/s/ _____
David P. Corrigan (VSB No. 26341)
Jeremy D. Capps (VSB No. 43909)
Douglas E. Pittman (VSB No. 87915)
Attorneys for Gloucester County School Board
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
804-747-5200 - Phone
804-747-6085 - Fax
dcorrigan@hccw.com
jcapps@hccw.com
dpittman@hccw.com