

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

CHRISTOPHER DOYLE, LPC, LCPC,)	
individually and on behalf of his clients,)	
)	
Plaintiff,)	Civil Action No. 1:19-cv-00190-DKC
)	
v.)	INJUNCTIVE RELIEF SOUGHT
)	
LAWRENCE J. HOGAN, JR., Governor of)	
the State of Maryland, in his official capacity,)	
and BRIAN E. FROSH, Attorney General of)	
the State of Maryland, in his official capacity,)	
)	
Defendants.)	
)	

**PLAINTIFF’S RESPONSE TO COURT’S PAPERLESS ORDER (DOC. 39)
AND REQUEST FOR TELEPHONE CONFERENCE**

Plaintiff, CHRISTOPHER DOYLE, LPC, LCPC (“Doyle” or “Plaintiff”), pursuant to the Court’s Paperless Order (Doc. 39) regarding Plaintiff’s Time-Sensitive Motion to Amend Preliminary Injunction Hearing and Briefing Schedule, and Request for Expedited Consideration or Telephonic Status Conference (Doc. 38), responds to the Order as follows:

Of the options presented in the Order, Plaintiff elects to postpone the preliminary injunction hearing and seek a telephone conference on or after April 9, 2019. Because the discovery issues to be raised in Plaintiff’s forthcoming motion to compel are foundational to the issues before the Court in Plaintiff’s Motion for Preliminary Injunction (Doc. 2), Plaintiff believes it is necessary to brief the motion to compel and submit it to the Court for decision prior to the preliminary injunction hearing and continued briefing thereon. Plaintiff, therefore, respectfully requests postponement of the preliminary injunction hearing and briefing, and the scheduling of a telephone conference for April 9 or after, to discuss scheduling of the hearing and briefing, and any other matters.

/s/ John R. Garza
(signed by Roger K. Gannam
with permission of John R. Garza)
John R. Garza (D. Md. 01921)
GARZA LAW FIRM, P.A.
Garza Building
17 W. Jefferson Street, Suite 100
Rockville, Maryland 20850
301-340-8200 ext. 100
301-761-4309 FAX
jgarza@garzanet.com

/s/ Roger K. Gannam
Mathew D. Staver (Fla. 701092)[†]
Horatio G. Mihet (Fla. 26581)[†]
Roger K. Gannam (Fla. 240450)[†]
LIBERTY COUNSEL
P.O. Box 540774
Orlando, FL 32854-0774
407-875-1776
407-875-0770 FAX
court@LC.org
hmihet@LC.org
rgannam@LC.org

Attorneys for Plaintiff

[†] Admitted to appear *pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been filed this April 3, 2019, through the Court's ECF system, which will send a notice of electronic filing to all parties and counsel of record, including the following:

Kathleen A. Ellis
Assistant Attorney General
Maryland Department of Health
Suite 302, 300 West Preston Street
Baltimore, Maryland 21201
kathleen.ellis@maryland.gov
Attorney for Defendants

/s/ Roger K. Gannam
Attorney for Plaintiff