

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

PATRICK M. SHANAHAN, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

v.

PATRICK M. SHANAHAN, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' WITNESS LIST

Plaintiffs Nicholas Harrison, Richard Roe, Victor Voe and Outserve –SLDN, Inc. object to the inclusion of Col. Scott T. Frazier on Defendants' Witness List. Col. Frazier was not disclosed prior to the March 15, 2019 fact discovery cut-off date and, as such, Plaintiffs have not been able to depose him.

Dated: June 17, 2019

Respectfully submitted,

Scott Schoettes*

SSchoettes@lambdalegal.org

Kara Ingelhart*

KIngelhart@lambdalegal.org

LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.

105 W. Adams St., Suite 2600

Chicago, IL 60603

T: (312) 663-4413

John Harding

Virginia State Bar No. 87602

JHarding@winston.com

Lauren Gailey*

LGailey@winston.com

Laura Cooley

Virginia State Bar 93446

LCooley@winston.com

WINSTON & STRAWN LLP

1700 K St., NW

Washington, DC 20006

T: (202) 282-5000

Anthony Pinggera*

apinggera@lambdalegal.org

LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.

4221 Wilshire Blvd, Suite 280

T: (213) 382-7600

Julie A. Bauer*

JBauer@winston.com

WINSTON & STRAWN LLP

35 W. Wacker Dr.

Chicago, IL 60601

T: (312) 558-5600

Peter E. Perkowski*

peter@modernmilitary.org

OUTSERVE-SLDN, INC.

P.O. Box 65301

Washington, DC 20035-5301

T: (800) 538-7418

Andrew R. Sommer

Virginia State Bar No. 70304

sommer@gtlaw.com

GREENBERG TRAURIG LLP

1750 Tysons Blvd., Suite 1000

McLean, VA 22102

Attorneys for Plaintiffs

**pro hac vice*