

**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

**PARTIES' JOINT MOTION TO MODIFY THE COURT'S ORDER  
FOR THE LIMITED PURPOSE OF TAKING A DEPOSITION OUT OF TIME**

The Parties respectfully request that this Court amend the orders issued in *Harrison, et al. v. Shanahan, et al.*, see ECF No. 183, and in *Roe, et al. v. Shanahan, et al.*, see ECF No. 147 directing the parties to conduct additional discovery with respect to whether Plaintiff OutServe-SLDN, Inc. has associational and/or direct standing by the close of business on Monday, July 1, 2019, for the limited purpose of allowing the deposition of Andy Blevins, the Executive Director of OutServe, on July 2, 2019. The parties submit that there is good cause to take Mr. Blevins' deposition beyond the deadline previously set by this Court, as further explained in the memorandum accompanying this motion.

Dated: June 21, 2019

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## CERTIFICATE OF SERVICE

I certify that, on the 21st day of June, 2019, I caused this document to be filed electronically through the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: June 21, 2019

Respectfully submitted,

/s/ John H. Harding  
John W.H. Harding