

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BROCK STONE, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 1:17-cv-02459-GLR

Hon. George L. Russell, III

**PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO FILE A THIRD AMENDED COMPLAINT**

Plaintiffs respectfully move for leave to file a Third Amended Complaint pursuant to Rules 16(b)(4) and 15(a)(2) of the Federal Rules of Civil Procedure and Local Rule 103(6). A copy of Plaintiffs' Third Amended Complaint is attached hereto as Exhibit 1. A copy of the Second Amended Complaint marking the stricken material and proposed new material is attached as Exhibit 2. Plaintiffs' counsel conferred with counsel for Defendants regarding the Third Amended Complaint, and Defendants consent to the filing of the Third Amended Complaint.

Plaintiffs' proposed Third Amended Complaint contains new factual allegations concerning the stigmatic injury caused by the 2018 Mattis Policy, injuries that the Mattis Policy continues to cause to certain plaintiffs. The Third Amended Complaint also updates factual information about the Plaintiffs to account for the passage of time. The Third Amended Complaint does not add any new parties¹ or any new claims not included in the Second Amended Complaint.

¹ The Third Amended Complaint does substitute certain Defendants named in their official capacity, to account for changes in certain official positions.

MOTION *Granted* "this 6th day
of Nov. 20 19

George L. Russell III
GEORGE L. RUSSELL, III, U.S.D.J.