

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RYAN KARNOSKI, et al.,
Plaintiffs, and
STATE OF WASHINGTON,
Plaintiff-Intervenor,
v.
DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,
Defendants.

Case No. 2:17-cv-01297-MJP
**PLAINTIFFS’ NOTICE REGARDING
MOTIONS TO TRANSFER**

1 Please take notice that in accordance with Federal Rule of Civil Procedure 45(f), Plaintiffs
 2 have filed the following four Motions to Transfer in response to Defendants' Motion to Quash
 3 Third Party Subpoenas:¹

- 4 • Plaintiffs' Rule 45(f) Motion to Transfer, *Karnoski, et al. v. Trump, et al.*, No.
 5 2:20-mc-00010-RAJ-RJK, Dkt. No. 14 (E.D. Va. June 4, 2020 before the Hon.
 6 Judge Jackson) (Re: Subpoena of former Secretary of Defense James N. Mattis)
- 7 • Plaintiffs' Rule 45(f) Motion to Transfer, *Karnoski, et al. v. Trump, et al.*, No.
 8 1:20-mc-00015-LO-TCP, Dkt. No. 12 (E.D. VA. June 6, 2020 before the Hon.
 9 Judge O'Grady) (Re: Subpoena of former Vice Chairman of the Joint Chiefs of
 10 Staff General Paul J. Selva)
- 11 • Plaintiffs' Rule 45(f) Motion to Transfer, *Karnoski, et al. v. Trump, et al.*, No.
 12 1:20-mc-00016-LO-IDD, Dkt. No. 15 (E.D. Va. June 10, 2020 before the Hon.
 13 Judge O'Grady) (Re: Subpoena of sitting Secretary of Veterans Affairs Robert
 14 Wilkie Jr.)
- 15 • Plaintiffs' Rule 45(f) Motion to Transfer, *Karnoski, et al. v. Trump, et al.*, No.
 16 1:20-mc-00013-UA-JEP, Dkt. No. 8 (M.D.N.C. June 4, 2020 before Magistrate
 17 Judge Peake) (Re: Subpoena of former Vice Chief of Naval Operations Admiral
 18 William F. Moran)

19 Plaintiffs file this notice to advise this Court that in each of the foregoing motions,
 20 Plaintiffs refer to the Advisory Committee notes to the 2013 Amendments to Rule 45(f) stating
 21 that "[j]udges in compliance districts may find it helpful to consult with the judge in the issuing
 22 court presiding over the underlying case while addressing subpoena-related motions." And, on
 23 that basis, in each of these motions, Plaintiffs stated that "consultation with the Washington
 24 Court would aid [the judge in the compliance district] in assessing the complexity of the issues
 25 and whether transferring the motion to quash would promote Rule 45(f)'s interest in avoiding
 26 disruption of the underlying litigation." *See, e.g., Karnoski, et al. v. Trump, et al.*, No. 2:20-mc-
 27 00010-RAJ-RJK, Dkt. No. 14 at p. 16.

28 ¹ Plaintiffs also contemporaneously filed their respective oppositions to Defendants' motion to quash in each case.

1 Respectfully submitted June 11, 2020.

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on June 11, 2020.

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