

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

NICHOLAS HARRISON, et al.,

Plaintiffs,

v.

LLOYD J. AUSTIN, Secretary of Defense, et al.,

Defendants.

Civil Action No. 1:18-cv-641 (LMB/IDD)

RICHARD ROE, et al.,

Plaintiffs,

v.

LLOYD J. AUSTIN, Secretary of Defense, et al.,

Defendants.

Civil Action No. 1:18-cv-1565 (LMB/IDD)

**PLAINTIFF RICHARD ROE AND MODERN MILITARY ASSOCIATION OF  
AMERICA’S MOTION TO ENFORCE THE COURT’S ORDERS DATED  
APRIL 6, 2022 (AS AMENDED MAY 10, 2022) AND FOR AN ORDER TO SHOW  
CAUSE WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT**

Plaintiffs Richard Roe and Modern Military Association of America, Inc. (“MMAA”) respectfully move this court to enforce its orders dated April 6, 2022 (as amended May 10, 2022) and for an order to show cause why defendants should not be held in contempt. In support of this motion, movants submit a memorandum in support filed herewith.

Dated: May 3, 2023	Respectfully submitted,
Peter Perkowski* PERKOWSKI LEGAL, PC 515 S. Flower St., Suite 1800 Los Angeles, CA 90071 T: (213) 340-5796 pperkowski@perkowskilegal.com <i>Attorney for Plaintiffs Roe, Harrison, and MMAA</i>	<i>/s/ Ashley R. Phillips</i> Ashley R. Phillips Virginia State Bar No. 95935 WILLIAMS MULLEN Williams Mullen Center 200 S. 10th St., Suite 1600 Richmond, VA 23219 T: (804) 420-6348 aphillips@williamsmullen.com <i>Attorney for Plaintiffs Roe and MMAA</i>

<p>Scott A. Schoettes* SCOTT A. SCHOETTES, ESQ. 14500 Round Valley Dr. Sherman Oaks, CA 91403 T: (773) 474-9250 sschoettes@gmail.com <i>Attorney for Plaintiffs Roe and MMAA</i></p> <p><i>*pro hac vice</i></p>	
--	--

**CERTIFICATE OF SERVICE**

I certify that, on May 3, 2023, 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: May 3, 2023

Respectfully submitted,

/s/ Ashley R. Phillips

Ashley R. Phillips

Virginia State Bar No. 95935

WILLIAMS MULLEN PC

Williams Mullen Center

200 S. 10th St., Suite 1600

Richmond, VA 23219

T: (804) 420-6348

aphillips@williamsmullen.com