

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

2024 MAR -8 P 3:27

**BRIANNA BOE, et al.,**

**Plaintiffs,**

**and**

**UNITED STATES OF AMERICA,**

**Plaintiff-Intervenor,**

**v.**

**STEVE MARSHALL, in his official  
capacity as Attorney General of the  
State of Alabama, et al.,**

**Defendants.**

TREY CRANGER, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**Case No.: 2:22-cv-184-LCB**

**\*\*Filed Under Seal\*\***

**RESPONDENT A. ORR'S MOTION FOR LEAVE TO SUBMIT  
ADDITIONAL EVIDENCE**

Respondent Asaf Orr ("Respondent" or "Mr. Orr") hereby moves the Court for leave to submit the following additional evidence in response to the Court's February 21, 2024 Order to Show Cause (Dkt. No. 406) ("Order"), which invites Respondents to move the Court to consider additional evidence "necessary for the Court to determine a Respondent's culpability or an appropriate sanction."

First, Respondent seeks leave to file a supplemental declaration setting forth additional evidence in response to the Court's Order, including (1) Mr. Orr's

statement regarding his responsibility for conduct identified in the Panel's Final Report; (2) Mr. Orr's record as an attorney since his admission to the Bar and the impact that the threat of sanctions since May 2022 has had on him personally and professionally; and (3) additional evidence regarding points of concern identified by the Panel, the Panel's Final Report, and the Court's Order, such as Mr. Orr's telephone call with Shannon Minter, the Legal Director for National Center for Lesbian Rights, the April 15, 2022 conference call with the *Ladinsky v. Ivey* team, and Mr. Orr's role in identifying plaintiffs for the *Ladinsky* and *Eknes-Tucker v. Marshall* cases. Respondent is prepared to file this supplemental declaration at the Court's request, or absent instruction from the Court, concurrently with his response to the Order on March 22, 2024.

Second, Respondent understands that expert testimony from three experts will be offered into evidence by other parties and that details of that proffered testimony, or a summary thereof, will be presented to the Court in motions filed on March 7-8, 2024, by other parties. Respondent requests leave of the Court to adopt the portions of this expert testimony applicable to his situation and thereby present such testimony to the Court on his own behalf.

Accordingly, Respondent respectfully requests leave of the Court to submit additional evidence via (1) a supplemental declaration by Respondent and (2) the expert testimony to be offered by other parties. Respondent reserves the right to

amend this motion in the event the Court provides additional information about the conduct Respondent allegedly committed that the Court is considering as a basis for any sanction.

Respectfully submitted,



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*Counsel for Respondent Asaf Orr*

**CERTIFICATE OF SERVICE**

I certify that, on March 8, 2024, I filed the foregoing under seal with the Clerk of Court, and I will serve a copy on all counsel of record by email.

  
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OF COUNSEL