

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN BAR ASSOCIATION, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

)
)
)
) Civil Action No. 16-2476-TJK
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)

MOTION REQUESTING STATUS CONFERENCE

Plaintiffs, the American Bar Association, Geoffrey Burkhardt, Michelle Quintero-Millan, Jamie Rudert, and Kate Voigt respectfully request an in-person or telephonic conference in the next 30 days, or at the Court's earliest convenience.

Briefing on the parties' cross-motions for summary judgment has been complete for over nine months, since September 8, 2017. Plaintiffs filed their summary judgment motion on May 24, 2017, (ECF 17). On July 31, 2017, Defendants opposed Plaintiffs' motion, (ECF 23), and filed a cross-motion for summary judgment, (ECF 22). Plaintiffs filed their combined reply and opposition on August 21, 2017. (ECF 25). Defendants filed their reply on September 8, 2017. (ECF 31).

Two motions requesting that the Court permit extra-record review, or take judicial notice, are also pending. Plaintiffs filed those motions on August 21, 2017, and December 8, 2017, respectively. (ECF 24, 35). Briefing on the first of those motions has been complete since September 15, 2017, (*see* ECF 30, 32), and briefing on the second has been complete since December 29, 2017, (*see* ECF 36, 37).

Plaintiffs respectfully request the opportunity to discuss the status of the case with the Court, in light of the ongoing harm Plaintiffs are alleging.

Dated: June 15, 2018

Respectfully submitted,

/s/ Chong S. Park

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LOCAL CIVIL RULE 7(m) STATEMENT

Counsel for Plaintiffs conferred in good faith with counsel for Defendants regarding the substance of this motion. Defendants' counsel did not state any objection to the motion. Instead, he stated:

Defendants take no position on Plaintiffs' motion but note that Plaintiffs have recently filed a motion requesting a status conference. *See* Pls.' Mot. for Scheduling of Status Conf., ECF No. 38.

/s/ Chong S. Park

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2018, I electronically filed the foregoing motion with the Clerk of the Court using the Court's electronic filing system, which will send a notice of electronic filing to all Counsel of Record.

/s/ Chong S. Park
Chong S. Park