

Plaintiffs wonder whether they have leave to amend their complaint. *See* Mot. for Clarif. (ECF No. 52) 1. But they have not filed a *motion* asking this Court for leave to amend their complaint; nor have they complied with the Local Rules, which require them to attach “an original of the proposed pleading as amended.” LCvR 7(i). Until the RNC sees Plaintiffs’ proposed amendments, they cannot take a position on whether Plaintiffs are entitled to leave (or whether their motion is, for example, futile). This Court should not grant Plaintiffs leave to amend until they comply with the rules and properly move for that relief. This Court should disregard Plaintiffs’ nearly ten additional pages of arguments for why they should be allowed to amend, as those substantive points do not belong in a motion that purports to seek mere clarification of ministerial questions.

Plaintiffs also wonder whether they need to wait to seek leave to amend their complaint until after this Court resolves their remaining claim. *See* Mot. for Clarif. 1. The RNC does not oppose this Court clarifying that Plaintiffs can wait to seek leave to amend their complaint until after the Court has ruled on their 42 U.S.C. §1985(3) claim.

Dated: June 1, 2022

Respectfully submitted,

/s/ David A. Warrington  
David A. Warrington (1616846)  
Harmeet K. Dhillon  
Mark P. Meuser  
Gary M. Lawkowski (VA125)  
DHILLON LAW GROUP INC.  
2121 Eisenhower Avenue, Suite 402  
Alexandria, VA 22314  
(415) 433-1700  
[dwarrington@dhillonlaw.com](mailto:dwarrington@dhillonlaw.com)  
[harmmeet@dhillonlaw.com](mailto:harmmeet@dhillonlaw.com)  
[mmeuser@dhillonlaw.com](mailto:mmeuser@dhillonlaw.com)  
[glawkowski@dhillonlaw.com](mailto:glawkowski@dhillonlaw.com)

Tyler R. Green (982312)  
Cameron T. Norris (VA083)  
Patrick N. Strawbridge  
CONSOVOY MCCARTHY PLLC  
1600 Wilson Blvd., Ste. 700  
Arlington, VA 22209  
(703) 243-9423  
[tyler@consovoymccarthy.com](mailto:tyler@consovoymccarthy.com)  
[cam@consovoymccarthy.com](mailto:cam@consovoymccarthy.com)  
[patrick@consovoymccarthy.com](mailto:patrick@consovoymccarthy.com)

**CERTIFICATE OF SERVICE**

I e-filed this response via ECF, which will email everyone requiring notice.

Dated: June 1, 2022

/s/ David A. Warrington