

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

CHARLES H., ISRAEL F., AND MALIK Z.  
on behalf of themselves and all others  
similarly situated,

*Plaintiffs,*

v.

THE DISTRICT OF COLUMBIA, *et al.*,

*Defendants.*

Civil Action No. 1:21-cv-00997 (CJN)

**PLAINTIFFS' MOTION FOR AN ORDER ADJUDGING THE DISTRICT TO BE IN  
CONTEMPT FOR FAILING TO COMPLY WITH THE PRELIMINARY  
INJUNCTION ORDER AND IMPOSING FURTHER  
RELIEF FOR SUCH CONTEMPT  
AND  
REQUEST FOR EXPEDITED CONSIDERATION**

Pursuant to Rule 7(b) of the Federal Rules of Civil Procedure, Local Civil Rule 7, and the inherent power of the Court, Plaintiffs hereby move this Court for an Order adjudging the District in contempt of this Court's June 16, 2021 Preliminary Injunction Order (ECF No. 37). Plaintiffs respectfully request that the Court enter the proposed order adjudging the District in contempt and imposing further relief for the contempt in the form of additional Court monitoring and in the form of additional education and related services to the class members to compensate for those hours lost due to the District's noncompliance.

**REQUEST FOR EXPEDITED CONSIDERATION**

Due to the transient nature of the plaintiff class and the attendant likelihood that some class members will miss out on the relief sought for the District's contempt in failing to deliver the education due them, Plaintiffs respectfully request that the Court consider this motion on an

expedited schedule and, pursuant to Local Rule 7(b), direct the District to file its opposition no later than the 14 days provided by such rule, without opportunity for additional time, that Plaintiffs' reply within three business days thereafter, and that the Court issue its decision as soon as possible thereafter.

\* \* \*

A supporting memorandum of points and authorities is filed herewith.

**STATEMENT PURSUANT TO LOCAL CIVIL RULE 7(m)**

Plaintiffs' counsel conferred with the District's counsel, Micah Bluming, concerning this motion on October 18, 2021. Mr. Bluming stated that the District opposes this motion. He also stated that "the District opposes any request to preemptively limit the District's ability to seek relief under the Rules. The District believes the deadlines specified by the Federal and Local Rules are adequate and defers to the Court on the timing of its decision."

Respectfully submitted,

*/s/ Zenia Sanchez Fuentes*

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