United States District Court Eastern District of Virginia Alexandria Division

The PUBLIC INTEREST LEGAL FOUNDATION Plaintiff, v. SUSAN REED, in her official capacity as General Registrar for the City of Manassas, Defendant. RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

RESPONSE IN OPPOSITION TO SUSAN REED'S MOTION TO DISMISS PURSUANT TO RULE 12(B)(6)

Plaintiff Public Interest Legal Foundation, through counsel, files this opposition to

Defendant Susan Reed's Motion to Dismiss Pursuant to Rules 12(b)(6). (Dkt. 8.)

Dated: December 6, 2016 Respectfully submitted,

For the Plaintiff

/s/

J. Christian Adams (Va. Bar # 42543) Attorney for Public Interest Legal Foundation, Inc. 300 N. Washington Street Suite 405 Alexandria, Virginia 22314 (703) 963-8611 Fax: (888) 815-5641 adams@publicinterestlegal.org

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December, 2016, a true and correct copy of the foregoing Response in Opposition to Motion to Dismiss Pursuant to Rule12(b)(6) was served on all parties via this Court's ECF system, which notified the following counsel of record:

William W. Tunner, Esq. (VSB No. 38358) ThompsonMcMullan 100 Shockoe Slip Richmond, VA 23219-4140 Phone: (804) 649-6205

Phone: (804) 649-6205 Fax: (804) 780-1813

E-mail: wtunner@t-mlaw.com

Counsel for Defendant