

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

CALVERT L. POTTER, *et al.*,

Plaintiffs,

v.

DISTRICT OF COLUMBIA,

Defendant.

No. 01-cv-1189 (RJL)

STEVEN B. CHASIN, *et al.*,

Plaintiffs,

v.

DISTRICT OF COLUMBIA,

Defendant.

CONSOLIDATED CASES

No. 05-cv-1792 (RJL)

**PLAINTIFFS' MOTION FOR JUDGMENT OF CIVIL CONTEMPT**

Plaintiffs Steven Chasin, Calvert Potter, Jasper Sterling, and Hassan Umrani ("Plaintiffs") respectfully move this Court for a judgment of civil contempt and an award of damages, including attorneys' fees, against Defendant District of Columbia for its violation of the permanent injunction issued by this Court in the above-captioned matters. *See* Permanent Inj. and Order, *Potter* ECF No. 157. This Motion is based on the accompanying Memorandum of Points and Authorities, the attached Declarations of Steven Chasin, Calvert Potter, Jasper Sterling, Hassan Umrani, Arthur B. Spitzer, and Robert K. Kelner and all exhibits thereto, and all prior pleadings and proceedings in this matter.

Pursuant to Local Civil Rule 7(m), before filing this Motion, Plaintiffs' counsel conferred in good faith with Defendant's counsel in an attempt to settle this matter and determine whether

there is any opposition to the relief sought. On January 31, 2022, Plaintiffs' counsel sent Defendant's counsel a letter with an offer to settle Plaintiffs' outstanding claims for damages that had accrued during the time they were removed from field duty in violation of the Permanent Injunction. *See* Mem. at 12. Counsel for all parties have engaged in settlement discussions and exchanged multiple settlement offers. *See id.* at 12-13. These efforts have failed to produce a mutually-acceptable settlement agreement.

On October 25, 2022, Plaintiffs' counsel first notified Defendant's counsel of Plaintiffs' intent to file this Motion, and counsel for the parties subsequently met and conferred via Microsoft Teams on October 26, 2022. *Id.* at 12. Following the failure of subsequent settlement discussions, Plaintiffs' counsel notified Defendant's counsel on November 4, 2022 that Plaintiffs' would proceed to file this Motion with the Court. Plaintiffs understand that Defendant opposes this motion.

Dated: November 7, 2022

Respectfully submitted,

/s/ Kevin B. Collins

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\* Application for admission pending in this Court.

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