IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LINCHPINS OF LIBERTY, et al.,	
Plaintiffs,)	
v.)	Civil Action No. 1:13-cv-00777-RBW
UNITED STATES OF AMERICA, et al.,	
Defendants.)	

JOINT MOTION FOR APPROVAL OF PROPOSED CONSENT ORDER

The parties in the above-captioned action have reached an agreement to settle this case upon entry of the attached proposed Consent Order. This settlement will resolve all remaining claims in this action. The parties therefore respectfully move the Court to approve the content of the attached proposed Consent Order.¹ A proposed order accompanies this motion.

DATED: October 25, 2017.

¹ The parties are not seeking entry of the Consent Order at this time. Upon the Court's approval, the parties will submit a copy of the order signed by the United States and the individual Plaintiffs to be entered by the Court.

Respectfully submitted,

Jay Alan Sekulow, Counsel of Record (D.C. Bar No. 496335) Stuart J. Roth (D.C. Bar No. 475937) Andrew J. Ekonomou* Jordan A. Sekulow (D.C. Bar No. 991680) Robert W. Ash* /s/ Carly F. Gammill Carly F. Gammill (D.C. Bar No. 982663) Abigail A. Southerland (TN Bar No. 26608) Miles L. Terry (D.C. Bar No. 1011546)* AMERICAN CENTER FOR LAW &JUSTICE 201 Maryland Avenue, NE Washington, DC 20002 Tel. (202) 546-8890 Fax (202) 546-9309 sekulow@aclj.org

Julian A. Fortuna*
Taylor English & Duma, LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Tel. (770) 434-6868
Fax (770) 434-7376

Jfortuna@taylorenglish.com

Attorneys for Plaintiff
*Admitted pro hac vice

DAVID A. HUBBERT Acting Assistant Attorney General Tax Division

/s/ Joseph A. Sergi JOSEPH A. SERGI (DC 480837) Senior Litigation Counsel U.S. Department of Justice, Tax Division 555 4th Street, N.W., JCB 7207 Washington, D.C. 20001 (202) 305-0868 Joseph.A.Sergi@usdoj.gov

LAURA M. CONNER (VA 40388) STEVEN M. DEAN (DC 1020497) JOSEPH R. GANAHL (MD) W. CARL HANKLA (DC 411665) JEREMY N. HENDON (OR 982490) Trial Attorneys U.S. Department of Justice, Tax Division 555 4th Street, N.W. Washington, D.C. 20001 (202) 514-20000

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LINCHPINS OF LIBERTY, et al.,))
Plaintiffs,))
v.	Civil Action No. 1:13-cv-00777-RBW
UNITED STATES OF AMERICA, et al.,))
Defendants.)))

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2017, the JOINT MOTION FOR APPROVAL OF PROPOSED CONSENT ORDER in the above-captioned matter was filed with the United States District Court for the District of Columbia via the Court's CM/ECF system.

/s/ Joseph A. Sergi JOSEPH A. SERGI