

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

RAYMING CHANG, *et al.*,

Plaintiffs

v.

UNITED STATES, *et al.*,

Defendants.

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: Civ. Action No. 02-2010 (EGS)
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JEFFREY BARHAM, *et al.*,

Plaintiffs,

v.

CHIEF CHARLES H. RAMSEY, *et al.*,

Defendants.

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: Civ. Action No. 02-02283 (EGS)
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JULIE ABBATE, *et al.*,

Plaintiffs,

v.

CHARLES H. RAMSEY, *et al.*,

Defendants.

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: Civ. Action No. 03-00767 (EGS)
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JOEL DIAMOND, *et al.*,

Plaintiffs,

v.

DISTRICT OF COLUMBIA,

Defendants.

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: Civ. Action No. 03-02005 (EGS)
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: Next court event: Status Conference
: November 25, 2003, at 10:00 a.m.
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**MOTION OF DEFENDANTS DISTRICT OF COLUMBIA,
CHIEF CHARLES H. RAMSEY, AND MAYOR ANTHONY A. WILLIAMS,
FOR CONSOLIDATION OF RELATED CASES**

Defendants in the four above-captioned related cases, District of Columbia (the “District”), Metropolitan Police Department (“MPD”) Chief Charles H. Ramsey, and Mayor Anthony A. Williams, collectively, the (“District Defendants”) respectfully move the Court for an order, pursuant to Fed. R. Civ. P. Rules 1, 16, 23, 26, and 42, (1) consolidating these cases for purposes of discovery and (2) consolidating these cases for purposes of trial, or, in the alternative, restricting the number of cases through which plaintiffs may pursue permanent injunctive relief against the defendants. The relief requested is consistent with this Court’s recognition of the merits of consolidation in the litigation of these cases in its Memorandum Decision and Order, dated September 19, 2003. Further, the requested relief is suited to achieving the just, speedy, and inexpensive resolution of these cases as mandated by the Federal Rules of Civil Procedure. These reasons are explained in greater detail in the accompanying, supporting memorandum of points and authorities, which is incorporated into this motion by reference.

Pursuant to LCvR 7.1(m), undersigned counsel communicated the District Defendants’ request for relief sought through this motion with counsel for each of the other parties. MPD Assistant Chief Peter Newsham does not oppose the consolidation of these cases for purposes of discovery and trial, but does not waive any jurisdictional challenges or defenses available to him. The Jones plaintiffs do not oppose the relief requested. Oppositions to the motion are anticipated

from the Federal Defendants, the Chang plaintiffs, the *Abbate* plaintiffs and the *Barham* plaintiffs.

Respectfully submitted,

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Attorneys for District Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of November 2003, true copies of the foregoing MOTION OF DEFENDANTS DISTRICT OF COLUMBIA, CHIEF CHARLES H. RAMSEY, AND MAYOR ANTHONY A. WILLIAMS, FOR CONSOLIDATION OF RELATED and the accompanying supporting memorandum of points and authorities and proposed Order, and accompanying memorandum of points and authorities were filed electronically with the Court for ECF service upon:

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