

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SANDRA GARZA

*

Plaintiff

*

v.

*

Case No.: 1:23-cv-00038-APM

DONALD J. TRUMP, et al.,

*

Defendants

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* * * * *

**DEFENDANT TANIOS’ RESPONSE IN OPPOSITION TO PLAINTIFF’S MOTION
FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**


Defendant, George Pierre Tanios, by his undersigned counsel, submits this Response In Opposition to Plaintiff’s Motion For Leave To File First Amended Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure and Rule LCvR7(a) and (m) of the Rules of the United States District Court for the District of Columbia, and for reasons states:

1. The Plaintiff’s Motion for Leave to File First Amended Complaint should be denied because the proposed changes demonstrate the legal futility of the Amendment and do not state a claim on which relief can be granted.
2. The Plaintiff’s Motion for Leave to File First Amended Complaint should be denied because the Plaintiff has failed to comply with the Local Rule LCvR7(a) requirement that it include a Statement of Points and Authorities.
3. The Plaintiff’s Motion for Leave to File First Amended Complaint should be denied because Plaintiff has not made a good faith attempt to confer with the Defendant to obtain consent before filing the Motion as required by Local Rule LCvR7(m).
4. Defendant incorporates by reference its Statement of Points and Authorities In Opposition to Plaintiff’s Motion For Leave To File First Amended Complaint as if

fully set forth herein.

WHEREFORE, based on the foregoing, Defendant George Pierre Tanios respectfully requests that the Plaintiff's Motion For Leave To File First Amended Complaint be denied.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of June 2023, a copy of the foregoing Response was served via the Court's e-filing to:

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