

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SEALED PLAINTIFF 1)	
)	
and)	
)	
SEALED PLAINTIFF 2,)	
)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:22-cv-00670-MHL
)	
PATRIOT FRONT, et al.,)	
)	
)	
Defendants.)	

**PLAINTIFFS’ RESPONSE TO NOTICE OF
THE CLERK’S INTENTION TO PROCEED WITH ABATEMENT AND
MOTION FOR LEAVE TO TAKE LIMITED DISCOVERY**

Plaintiffs, by counsel, respectfully submit this response to the Notice of the Clerk’s Intention to Proceed with Abatement (ECF No. 91). For the reasons outlined in the attached memorandum, Plaintiffs request that the Court find good cause shown for the delay in service of process on Jacob Brown and extend the deadline for service. To help effectuate such service, Plaintiffs further request that the Court grant Plaintiffs leave to take limited discovery of Brown’s responding co-Defendants for the sole purpose of identifying Brown’s contact information and location.

Date: June 22, 2023

Respectfully submitted,

SEALED PLAINTIFFS 1 and 2

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CERTIFICATE OF SERVICE

I certify that on June 22, 2023, I caused a copy of the foregoing to be electronically filed using the CM/ECF system, which will send notification to counsel of record of such filing by operation of the Court's electronic system. Parties may access this filing via the Court's electronic system. Additionally, copies have been sent to the following via Email:

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