

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GLORIA PERSONHUBALLAH, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
JAMES B. ALCORN, et al.,)	Civil Action No.: 3:13-cv-678
)	
Defendants.)	
)	
)	
)	
)	

**INTERVENOR-DEFENDANTS' CONSENT MOTION TO ENTER AGREED ORDER
REGARDING SUBMISSION OF PROPOSED REMEDIAL PLANS**

Intervenor-Defendants respectfully move the Court to enter the attached Agreed Order Regarding Submission Of Proposed Remedial Plans. The support for this Consent Motion is set forth in the accompanying memorandum. Counsel for Intervenor-Defendants has conferred with counsel for Plaintiffs and counsel for Defendants, and all parties consent to the relief requested and the form of the Agreed Order.

Dated: September 16, 2015

Respectfully submitted,

/s/ Mark R. Lentz

Michael A. Carvin (*pro hac vice*)

John M. Gore (*pro hac vice*)

Mark R. Lentz (VSB #77755)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, DC 20001

Tel: (202) 879-3939

Fax: (202) 626-1700

Email: macarvin@jonesday.com

Email: jmgore@jonesday.com

Email: mrlentz@jonesday.com

Counsel for Intervenor-Defendants

CERTIFICATE OF SERVICE

I certify that on September 16, 2015, a copy of the INTERVENOR-DEFENDANTS' CONSENT MOTION TO ENTER AGREED ORDER REGARDING SUBMISSION OF PROPOSED REMEDIAL PLANS was filed electronically with the Clerk of Court using the ECF system, which will send notification to the following ECF participants:

John K. Roche, Esq.
Mark Erik Elias, Esq.
John Devaney, Esq.
PERKINS COIE, LLP
700 13th Street, N.W., Suite 600
Washington, D.C. 20005-3960
Tel. (202) 434-1627
Fax (202) 654-9106
JRoche@perkinscoie.com
MElias@perkinscoie.com
JDevaney@perkinscoie.com

Kevin J. Hamilton, Esq.
PERKINS COIE, LLP
1201 Third Avenue, Ste. 4800
Seattle, WA 98101-3099
Tel. (202) 359-8000
Fax (202) 359-9000
KHamilton@perkinscoie.com

Counsel for Plaintiffs

Dated: September 16, 2015

Stuart A. Raphael
Trevor S. Cox
Mike F. Melis
Office of the Attorney General
900 East Main Street
Richmond, VA 23219
Telephone: (804) 786-2071
Fax: (804) 371-2087
sraphael@oag.state.va.us
tcox@oag.state.va.us
mmelis@oag.state.va.us

Counsel for Defendants

/s/ Mark R. Lentz
Mark R. Lentz

Counsel for Intervenor-Defendants