

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

Latasha Holloway, et al.,

Plaintiffs,

v.

City of Virginia Beach, et al.,

Defendants.

Civil Action No. 2:18-cv-0069

**PLAINTIFFS' MOTION TO EXCLUDE 20 WITNESSES DEFENDANTS FAILED
TO DISCLOSE UNTIL AFTER THE CLOSE OF DISCOVERY**

Plaintiffs Latasha Holloway and Georgia Allen respectfully move this Court to exclude 20 individuals that Defendants disclosed in a supplement to their initial disclosures eight months after the close of discovery. Fed. R. Civ. P. 26, 37; Local Rule 37. Plaintiffs seek to remove these 20 individuals from Defendants supplement to their initial disclosures because Defendants disclosure is neither substantially justified nor harmless.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion and prohibit Defendants from relying on testimony or evidence from the individuals on a motion, at a hearing, or at trial.

Dated: July 9, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the July 9, 2020, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to the following:

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