

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

TREVOR FITZGIBBON,

PLAINTIFF

vs.

JESSELYN A. RADACK,

DEFENDANT

Civil Action No. 3:18-cv-247-REP

RESPONSE TO PLAINTIFF'S MOTION FOR A RESTRAINING ORDER

Defendant concedes the motion and will not oppose entry of an order consistent with the relief sought in Plaintiff's Motion for a Restraining Order. As counsel for plaintiff agreed at the hearing on the motion, this concession obviates the need for depositions or a hearing on the motion.

The undersigned¹ prepared a proposed stipulated order which counsel for Plaintiff rejected. On Friday morning, the undersigned requested that counsel for Plaintiff draft a proposed order that would be acceptable to him. However, as of the time of this filing, no proposed order has been provided by counsel for Plaintiff. Accordingly, Defendant respectfully suggests that the Court enter an order consistent with that laid out on pages 1-2 of Plaintiff's Motion for a Restraining Order [ECF dkt: 30].

¹ Counsel for Defendant has moved to withdraw as counsel. The Court has not ruled on that motion and therefore the undersigned remain counsel for Defendant at the time of this filing.

Respectfully Submitted,

/s/ Andrew Clarke

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**Pro hac vice*

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of July 2018, 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 (NEF) to the following:

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/s/ Andrew Clarke

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