UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY, MARISSA BLAIR, APRIL MUNIZ, MARCUS MARTIN, NATALIE ROMERO, CHELSEA ALVARADO, JOHN DOE, and THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER, CHRISTOPHER CANTWELL, JAMES ALEX FIELDS, JR., VANGUARD AMERICA, ANDREW ANGLIN, MOONBASE HOLDINGS, LLC, ROBERT "AZZMADOR" RAY, NATHAN DAMIGO, ELLIOT KLINE a/k/a/ ELI MOSLEY, IDENTITY EVROPA, MATTHEW HEIMBACH, MATTHEW PARROTT a/k/a DAVID MATTHEW PARROTT, TRADITIONALIST WORKER PARTY, MICHAEL HILL, MICHAEL TUBBS, LEAGUE OF THE SOUTH, JEFF SCHOEP, NATIONAL SOCIALIST MOVEMENT. NATIONALIST FRONT, AUGUSTUS SOL INVICTUS, FRATERNAL ORDER OF THE ALT-KNIGHTS, MICHAEL "ENOCH" PEINOVICH, LOYAL WHITE KNIGHTS OF THE KU KLUX KLAN, and EAST COAST KNIGHTS OF THE KU KLUX KLAN a/k/a EAST COAST KNIGHTS OF THE TRUE INVISIBLE EMPIRE,

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

Defendants.

PLAINTIFFS' RESPONSE TO DEFENDANT SPENCER'S MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT RICHARD B. SPENCER

Provided that Mr. Spencer remain in contact with Plaintiffs and continue to fulfill his remaining discovery obligations in this litigation, Plaintiffs have no objection to Defendant Spencer's Motion for Leave to Withdraw as Counsel for Defendant Richard B. Spencer. (ECF No. 727).

Date: May 21, 2020 Respectfully submitted,

<u>/s/</u>

Robert T. Cahill (VSB 38562) COOLEY LLP 11951 Freedom Drive, 14th Floor Reston, VA 20190-5656 Telephone: (703) 456-8000

Fax: (703) 456-8100 rcahill@cooley.com

Counsel for Plaintiffs

Roberta A. Kaplan (pro hac vice)
Julie E. Fink (pro hac vice)
Gabrielle E. Tenzer (pro hac vice)
Michael L. Bloch (pro hac vice)
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, NY 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
gtenzer@kaplanhecker.com

mbloch@kaplanhecker.com

Of Counsel:

Karen L. Dunn (pro hac vice)
William A. Isaacson (pro hac vice)
Jessica Phillips (pro hac vice)
BOIES SCHILLER FLEXNER LLP
1401 New York Ave, NW
Washington, DC 20005
Telephone: (202) 237-2727
Fax: (202) 237-6131
kdunn@bsfllp.com
wisaacson@bsfllp.com
jphillips@bsfllp.com

Yotam Barkai (*pro hac vice*) BOIES SCHILLER FLEXNER LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 446-2300

Fax: (212) 446-2350 ybarkai@bsfllp.com

David E. Mills (pro hac vice) Joshua M. Siegel (VSB 73416) COOLEY LLP 1299 Pennsylvania Avenue, NW Suite 700 Washington, DC 20004 Telephone: (202) 842-7800

Fax: (202) 842-7899 dmills@cooley.com jsiegel@cooley.com

Alan Levine (pro hac vice)
Philip Bowman (pro hac vice)
COOLEY LLP
1114 Avenue of the Americas, 46th Floor
New York, NY 10036
Telephone: (212) 479-6260
Fax: (212) 479-6275
alevine@cooley.com
pbowman@cooley.com

J. Benjamin Rottenborn (VSB 84796) WOODS ROGERS PLC 10 South Jefferson St., Suite 1400 Roanoke, VA 24011 Telephone: (540) 983-7600 Fax: (540) 983-7711 brottenborn@woodsrogers.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Justin Saunders Gravatt
David L. Hauck
David L. Campbell
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
jgravatt@dhdglaw.com
dhauck@dhdglaw.com
dcampbell@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

Bryan Jones 106 W. South St., Suite 211 Charlottesville, VA 22902 bryan@bjoneslegal.com

Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South

William Edward ReBrook , IV The Rebrook Law Office 6013 Clerkenwell Court Burke, VA 22015 edward@rebrooklaw.com

Counsel for Defendants Jeff Schoep, National Socialist Movement, and Nationalist Front

Elmer Woodard 5661 US Hwy 29 Blairs, VA 24527 isuecrooks@comcast.net

James E. Kolenich Kolenich Law Office 9435 Waterstone Blvd. #140 Cincinnati, OH 45249 jek318@gmail.com

Counsel for Defendants Matthew Parrott, Traditionalist Worker Party, Jason Kessler, Nathan Damigo, and Identity Europa, Inc. (Identity Evropa)

John A. DiNucci Law Office of John A. DiNucci 8180 Greensboro Drive, Suite 1150 McLean, VA 22102 dinuccilaw@outlook.com

Counsel for Defendant Richard Spencer

I further hereby certify that on May 21, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

Elliot Kline eli.f.mosley@gmail.com

Robert Ray azzmador@gmail.com

Vanguard America c/o Dillon Hopper dillon hopper@protonmail.com Matthew Heimbach matthew.w.heimbach@gmail.com

Christopher Cantwell @gmail.com

/s/

Robert T. Cahill (VSB 38562) COOLEY LLP 11951 Freedom Drive, 14th Floor Reston, VA 20190-5656 Telephone: (703) 456-8000 Fax: (703) 456-8100 rcahill@cooley.com

Counsel for Plaintiffs