

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
NORTHERN DIVISION  
AT COVINGTON**

<b>NICHOLAS SANDMANN, by and through his parents and natural guardians, TED SANDMANN and JULIE SANDMANN,</b>	:	<b>CASE NO. 2:19-cv-00019-WOB-CJS</b>
	:	
	:	<b>JUDGE BERTELSMAN</b>
	:	
<b>Plaintiffs,</b>	:	<b>MAGISTRATE JUDGE SMITH</b>
	:	
<b>v.</b>	:	<b>PLAINTIFF NICHOLAS</b>
	:	<b>SANDMANN'S MOTION FOR</b>
<b>WP COMPANY LLC d/b/a THE WASHINGTON POST,</b>	:	<b>RELIEF FROM JUDGMENT UNDER</b>
	:	<b>RULE 60, MOTION FOR</b>
<b>Defendant.</b>	:	<b>RECONSIDERATION UNDER RULE</b>
	:	<b>59, AND FOR LEAVE TO AMEND</b>
	:	<b>COMPLAINT UNDER RULE 15</b>
	:	
	:	<b>ORAL ARGUMENT REQUESTED</b>

**NOW COMES** Nicholas Sandmann, by and through his parents and natural guardians, Ted Sandmann and Julie Sandmann, and by and through his counsel, and hereby respectfully moves this Court to reconsider and for relief from its Opinion and Order filed July 26, 2019 [Doc. 47] and Judgment filed July 26, 2019 [Doc. 48] granting Defendant WP Company LLC d/b/a The Washington Post's Motion to Dismiss and dismissing the Complaint with prejudice, based on manifest errors of fact and law. Additionally, Plaintiff Nicholas Sandmann respectfully moves this Court for Leave to Amend his Complaint and asks this Court to vacate the Judgment entered July 26, 2019 [Doc. 48]. A brief in support, a First Amended Complaint, and a proposed order are attached.

Respectfully submitted this 23<sup>rd</sup> day of August, 2019.

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**/s/ L. Lin Wood**

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2019, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

**/s/ Todd V. McMurtry**  
Plaintiff's Counsel