

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

LEANDRA ENGLISH,  
*Plaintiff,*

v.

DONALD J. TRUMP and  
JOHN M. MULVANEY,  
*Defendants.*

Case No. 1:17-cv-02534

**PLAINTIFF'S SCHEDULING REQUEST**

In the concluding section of their opposition filing, the defendants suggest that if the Court is inclined to deny our motion for a TRO, it should establish a preliminary injunction briefing schedule that stretches all the way to January 2018.

Respectfully, it appears that the defendants have misconstrued Ms. English's position. As Ms. English's attorney explained at the hearing yesterday, the standards for a TRO and a preliminary injunction are the same. Ms. English has therefore requested that the Court construe her motion as a request for both a TRO and a preliminary injunction. Deciding the motion in that manner would facilitate expeditious appellate review of this timely, important question that cries out for prompt and final resolution.

Ms. English further proposes that the Court, regardless of its resolution of the motion for a TRO or preliminary injunction, establish a short briefing schedule for dispositive cross-motions under Rule 12(b)(6) and Rule 12(c). The merits of this case have been thoroughly addressed in the parties' emergency filings and amicus briefs, and it would be fair and reasonable to order a full round of merits briefing within 7–10 days. That would allow the Court to rule expeditiously on the pure question of law raised by this litigation.

Respectfully submitted,

/s/ Deepak Gupta

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RACHEL BLOOMEKATZ (*pro hac vice* application to be filed)

JOSHUA MATZ (*pro hac vice* application to be filed)

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November 28, 2017

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2017, I electronically filed the foregoing request through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Deepak Gupta

Deepak Gupta