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Superior Court
of the District of Columbia

IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION

KALORAMA CITIZENS ASSOCIATION, *et al.*	:	
Plaintiffs,	:	
v.	:	2017 CA 004182 B
	:	Judge Puig-Lugo
SUNTRUST BANK COMPANY, *et al.*	:	
Defendants.	:	

PLAINTIFFS' MOTION TO HOLD PROCEEDINGS IN ABEYANCE UNTIL 30 DAYS FOLLOWING SUBMISSION TO THIS COURT OF COUNSEL'S NOTICE OF WITHDRAWAL WITH THE PLAINTIFFS' CONSENT

Plaintiffs Kalorama Citizens Association and Adams Morgan for Reasonable Development, by their counsel, Paul Zukerberg, respectfully move this Court to hold proceedings in this case in abeyance until at least 30 days following the submission by plaintiffs' counsel of a notice of withdrawal with the plaintiffs' consent pursuant to Superior Court Civil Rule 101(c)(1).

1. Plaintiffs' attorney is retiring from the practice of law effective as of June 15, 2023, and will no longer be able to represent plaintiffs in this case.

2. Defendant SunTrust informed plaintiffs' attorney on Friday, June 9 of plans to file a motion for summary judgment in this case. Defendant SunTrust further informed plaintiffs' attorney on Sunday, June 11 of plans to file a motion for leave to file in excess of the page limit. Plaintiffs' view is that their new attorney should be responsible for handling all matters on a going-forward basis to the extent possible, including responses to the two aforementioned motions when they are filed.

3. Plaintiffs are in the process of retaining a new attorney but have not yet entered into a representation agreement with a new attorney. Plaintiffs are working diligently on this process and expect to finalize a representation agreement with a new attorney by the week of June 19. Plaintiffs are community groups staffed by unpaid volunteers and with small budgets and limited financial resources and request the Court's indulgence as they complete this process as expeditiously as possible given their intrinsic limitations.

4. Defendant is the nation's seventh largest bank and has shown little urgency in moving this case to resolution. In fact, the defendant's planned motion for summary judgment will be its fourth motion for summary judgment and second time that it has filed a motion for summary judgment without waiting for this Court to establish a schedule for the submission of dispositive motions.

5. Because of the procedural and substantive complexity of this case that has built up in the six years since the case was first filed in June of 2017, plaintiffs expect that their new counsel will require 30 days to wade through the voluminous record in this case and settle on a definitive plan for the case, including the likely filing of an amended complaint to deal with the many developments that have taken place in this case since this lawsuit was first filed in June of 2017.

Therefore, Plaintiffs respectfully request that this Court grant their Motion to Hold Proceedings in Abeyance until 30 Days following Submission by the Plaintiffs' Counsel of a Notice of Withdrawal with the Consent of the Plaintiffs.

/S/ PAUL ZUKERBERG

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RULE 12-I CERTIFICATION

On June 12, 2023, counsel for the plaintiffs spoke with defense counsel by telephone but consent was not obtained for the relief sought.

/S/ PAUL ZUKERBERG

Paul Zukerberg

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was via the Court's electronic filing system and email this 13th day of June, 2023 to

Mary Zinsner, Esq.
Misha Tseytlin, Esq.
Elizabeth M. Briones, Esq.
Troutman Pepper Hamilton Sanders LLP
401 9th Street, NW, Suite 1000
Washington, DC 20004

/S/ PAUL ZUKERBERG

Paul H. Zukerberg, DC Bar # 388152

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Plaintiffs,	:	
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v.	:	2017 CA 004182 B
	:	Judge Puig-Lugo
SUNTRUST BANK COMPANY, *et al.*	:	
	:	
Defendants.	:	
	:	

ORDER

This cause is before the Court on the Plaintiffs' Motion to Hold Proceedings in Abeyance until 30 Days following Submission by the Plaintiffs' Counsel of a Notice of Withdrawal with the Consent of the Plaintiffs and that motion having been considered, and for good cause shown, it is this _____ day of _____, 2023,

ORDERED, that the motion is **granted**.

_____
JUDGE OF THE SUPERIOR COURT

Copies To:

All Counsel of Record

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