

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

UNITED STATES ASSOCIATION OF REPTILE  
KEEPERS, INC.,

Plaintiff,

- vs. -

THE HONORABLE SALLY JEWELL, *et al.*,

Defendants.

Civ. No.: 13-2007-EGS

**UNITED STATES ASSOCIATION OF REPTILE KEEPERS MOTION FOR ORAL  
ARGUMENT ON DEFENDANTS' MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 7(b) and Local Civil Rule 7(f), Plaintiff United States Association of Reptile Keepers, Inc. ("USARK") respectfully moves for oral argument on Federal Defendants' Motion to Dismiss USARK's Complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). (Defs. Mot., Dkt. No. 14 (Feb. 21, 2014).) Plaintiff conferred with counsel for the Federal Defendants in compliance with Local Civil Rule 7(m). Federal Defendants convey that they defer to the Court to determine whether it would like to hear oral argument on Federal Defendants' Motion to Dismiss.

**ARGUMENT**

This case, and the Federal Defendants' Motion itself, each raise several complex and novel questions of law. Therefore, USARK believes the Court would benefit from oral argument on this matter.

WHEREFORE, we pray this Court grant Plaintiff's motion.

Dated: April 1, 2014

Respectfully submitted,

/s/ Shaun M. Gehan \_\_\_\_\_

Shaun M. Gehan

D.C. Bar No. 483720

THE LAW OFFICE OF SHAUN M. GEHAN

3050 K Street, N.W. – Suite 400

Washington, D.C. 20007

Telephone: (202) 342-8469

Facsimile: (202) 342-8451

David E. Frulla

D.C. Bar No. 414170

KELLEY DRYE & WARREN LLP

3050 K Street, N.W. – Suite 400

Washington, D.C. 20007

Telephone: (202) 342-8400

Facsimile: (202) 342-8451

*Attorneys for Plaintiff*

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

UNITED STATES ASSOCIATION OF REPTILE  
KEEPERS, INC.,

Plaintiff,

- vs. -

THE HONORABLE SALLY JEWELL, *et al.*,

Defendants.

Civ. No.: 13-2007-EGS

**[PROPOSED] ORDER**

It is hereby ORDERED this \_\_\_ day of \_\_\_\_\_, 2014, that Plaintiff United States Association of Reptile Keeper's Motion for Oral Argument is hereby GRANTED. Oral argument is hereby set for \_\_\_\_\_.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Emmet G. Sullivan  
United States District Judge