

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION**

[Filed Electronically]

KASHIYA NWANGUMA, et al.,)	
)	
PLAINTIFFS)	
)	
v.)	CASE NO. 3:16-cv-247-DJH
)	
DONALD J. TRUMP, et al.,)	
)	
DEFENDANTS)	

PLAINTIFFS’ MOTION FOR HEARING

Plaintiffs Kashiya Nwanguma, Molly Shah, and Henry Brousseau respectfully request that the Court schedule a status conference in this matter, and in support of such request would respectfully show as follows:

1. This action was originally filed by Plaintiffs in Kentucky state court, but was removed to this Court by Defendants on April 29, 2016.
2. Defendants then moved this Court to dismiss Plaintiffs’ claims. The issues relating to Defendants’ motions to dismiss were fully briefed on July 28, 2016.
3. On November 8, 2016, Defendant Donald J. Trump was elected President of the United States. Neither Mr. Trump’s status as president-elect, nor his inauguration as President, immunizes him from Plaintiffs’ claims in this case. See *Clinton v. Jones*, 520 U.S. 681 (1997).
4. Plaintiffs are aware that the Court has not yet ruled on Defendants’ motions to dismiss, and it is not the purpose of this motion to rush the Court. However, given Mr. Trump’s election Plaintiffs believe that, if possible, Mr. Trump should be deposed in this case before he is required to assume the burden of the Presidency.

5. Plaintiffs have offered to depose Mr. Trump at a place and time of his choosing. His counsel has demurred, citing the pending motions to dismiss.

6. A brief status conference with the Court to discuss where matters stand, and to arrange Mr. Trump's deposition in the event the Court anticipates ruling on the motions to dismiss prior to Mr. Trump's inauguration, may be of critical benefit to the parties in this case and to this litigation.

WHEREFORE, Plaintiffs respectfully request that the Court schedule a status conference in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 2016, the foregoing was filed electronically through the Court's CM/ECF system, which electronically serves all counsel of record.

/s/ Gregory A. Belzley
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