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14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 THE MARY FERRELL FOUNDATION,  
17 INC.; JOSIAH THOMPSON; and GARY  
18 AGUILAR,

19 Plaintiffs,

20 v.

21 NATIONAL ARCHIVES AND RECORDS  
22 ADMINISTRATION,

23 Defendant.

No. 3:22-cv-06176-RS

**PLAINTIFFS' AMENDED MOTION FOR  
LEAVE TO FILE A THIRD AMENDED  
COMPLAINT**

Date: September 21, 2023

Time: 1:30 pm

Dept: Hon. Richard Seeborg

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1 On September 21, 2023, Plaintiffs will move the court for leave to file a Third Amended  
2 Complaint. This amended motion is based on the attached  
3 Amended Memorandum of Points and Authorities, the Amended Declaration of William  
4 M. Simpich, and the attached proposed Third Amended Complaint, as well as oral and  
5 documentary evidence that may be presented at the time of the hearing.  
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7 Dated: August 17, 2023

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/s/  
9 William M. Simpich  
Lawrence P. Schnapf  
10 Attorneys for Plaintiffs  
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