

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

SCOTT G. PERRY

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

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Case No. 22-mc-00079

**REQUEST TO HOLD IN ABEYANCE EMERGENCY MOTION FOR RETURN OF
SEIZED PROPERTY PURSUANT TO FED. R. CRIM. P. 41(g)
AND REQUEST FOR INJUNCTIVE AND OTHER RELIEF**

Plaintiff Rep. Scott G. Perry, by and through his undersigned counsel, hereby requests that this Court enter an order temporarily holding in abeyance his Emergency Motion for Return of Seized Property Pursuant to Fed. R. Crim. P. 41(g) and Request for Injunctive and Other Relief. Plaintiff makes this request in light of further communications with counsel for the Government since filing his Emergency Motion about a process to prevent the disclosure of information that is protected by the Speech and Debate Clause, the Attorney-Client Privilege, and other applicable privileges and protections. Granting this request will allow the parties to further discuss the possibility of resolving the Emergency Motion by agreement. Plaintiff reserves the right to renew his Motion should such resolution not be possible.

Dated: August 24, 2022

Respectfully Submitted,

E&W LAW, LLC

/s/ John S. Irving

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of August 2022, a copy of the foregoing Motion to Dismiss the Complaint Without Prejudice was served via the Court's CM/ECF system on all properly registered parties and counsel.

/s/ John S. Irving
John S. Irving (D.C. Bar No. 460068)

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[PROPOSED] ORDER

Upon consideration of the request of Plaintiff Rep. Scott G. Perry to hold in abeyance his Emergency Motion for Return of Seized Property Pursuant to Fed. R. Crim. P. 41(g) and Request for Injunctive and Other Relief pending efforts by counsel for the parties to resolve this matter by agreement, and for good cause shown, it is hereby

ORDERED that Plaintiff's Emergency Motion is held in abeyance until further notice.

Entered this __ day of August 2022

District Judge