

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

_____)
L.N.P.)
on his own behalf and on behalf of his)
dependent children P.D.P. and L.D.P.)
and on behalf of all others similarly situated)
))
Plaintiffs,)
))
- versus -)
))
FRANK BISIGNANO,)
Commissioner of Social Security Administration,)
et al.,)
))
Defendants.)
_____)

Case No. 1:24-cv-01196 (MSN/IDD)

CONSENT MOTION FOR LEAVE TO APPEAR WITHOUT LOCAL COUNSEL

Pursuant to Local Rule 83.1(F), Plaintiffs and the certified class, by and through undersigned counsel, hereby respectfully move this Court for leave to appear at the hearing on March 13, 2026, without the attendance of local counsel Joseph Green. Defendants do not object to this request. Good cause exists for this relief:

1. A hearing is scheduled on March 13, 2026, on Plaintiffs’ motion to enter final judgment and Defendants’ motion for summary judgment or in the alternative to stay execution of unfavorable judgment pending appeal.
2. Attorney Joseph Green, who is fully admitted to practice in this Court, was planning to attend the hearing as required by the Local Rule but a conflict has arisen requiring him to travel to South Carolina and New Jersey on March 12 and 13. He will therefore be unable to attend the hearing.

3. Attorneys Ira Kasdan and Damon Suden, who are admitted *pro hac vice*, intend to split the presentation of the arguments on behalf of Plaintiffs at the hearing. Mr. Green's presence is therefore not necessary for purposes of conducting the hearing.
4. Counsel for Defendants do not object to Mr. Green's absence at the hearing or to Plaintiffs' counsel splitting the presentation of the argument.
5. Proceeding with the hearing without Mr. Green—rather than continuing the hearing to a later date—will expedite resolution of this case. Both parties want to proceed with the hearing on March 13, 2026, and the Court recently ordered the same. Dkt. 151 (hearing shall proceed).
6. A proposed order is enclosed for the convenience of the Court.

Dated: March 4, 2026

Respectfully submitted,

/s/ Joseph J. Green

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PROPOSED ORDER

This matter comes before the Court on Plaintiffs’ Consent Motion for Leave to Appear Without Local Counsel. For good cause shown, it is hereby

ORDERED that Plaintiffs’ motion is GRANTED; and it is further

ORDERED that Jospheh J. Green is hereby relieved of the obligation to appear at the hearing on March 13, 2026.

ORDERED that Plaintiffs’ counsel may split the presentation of their arguments before the court.

March _____, 2026

 THE HONORABLE MICHAEL S. NACHMANOFF
 U.S. DISTRICT JUDGE