

**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 Friday, July 10, 2026, without the attendance of local counsel Josph Green. Defendants do not object to this request. Good cause exists for this relief:

1. A hearing is scheduled on Friday July 10, 2026, on Class Counsel’s motion for attorneys’ fees.
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, and Mr. Green will be in Maine on that day. He will therefore be unable to attend the hearing.
3. Attorneys Ira Kasdan and Damon Suden, who are admitted *pro hac vice*, will attend the hearing and are prepared to present arguments on behalf of Class Counsel 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.

5. Proceeding with the hearing without Mr. Green—rather than continuing the hearing to a later date—will expedite resolution of the motion. Both parties want to proceed with the hearing on July 10, 2026, if amenable to the Court.

Dated: July 2, 2026

Respectfully submitted,

/s/ Joseph J. Green

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Counsel for Plaintiffs

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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 July 10, 2026.

ORDERED that Plaintiffs’ counsel may each present their arguments before the court.

July _____, 2026

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