Exhibit B

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION

SHAWN SCOTT **W.S.** **E.S.** **S.S.** 1948 Capitol Ave., NE Washington, DC 20002 **DAVID BING** 1948 Capitol Ave., NE Washington, DC 20002 **ISAIAH NEAL** 1341 Congress St. SE Washington, DC 20032 **JOSHUA NEAL** 1948 Capitol Ave., NE Washington, DC 20002 Plaintiffs, v. **NATIONAL ENGINEERING PRODUCTS, INCORPORATED.** 1950 Capitol Avenue, N.E. Washington, DC 20002 Defendant.	Case No. 2025-CAB-003826 Judge Robert D. Okun **JURY TRIAL REQUESTED**

THIRD AMENDED COMPLAINT AGAINST NATIONAL ENGINEERING PRODUCTS, INCORPORATED FOR PRIVATE NUISANCE, PUBLIC NUISANCE, TRESPASS, STRICT LIABILITY, BATTERY, NEGLIGENCE, AND NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

Plaintiffs Shawn Scott, W.S., E.S., S.S., David Bing, Isaiah Neal and Joshua Neal, (collectively "Plaintiffs" or the "Scott Family") by and through their undersigned counsel, file this Complaint against National Engineering Products, Incorporated. ("NEP") seeking injunctive relief, compensatory and punitive damages for private nuisance, public nuisance, trespass, strict

liability, battery and negligent infliction of emotional distress for the health impacts of the operation of their Ivy City manufacturing facility.

INTRODUCTION

1. When Shawn Scott purchased her family a home in the historic Ivy City neighborhood, she did not know that their version of the American Dream would quickly become her own personal nightmare for her and her children.

2. Founded in 1872, Ivy City is a vibrant enclave in Northeast Washington, D.C. ("District of Columbia," the "District," or "D.C.") and is one of "DC's most historic Black communities."[1] The Ivy City neighborhood is a predominantly Black community that houses several historically significant locations for the District and its Black residents and has long been a thriving community in the District.[2] However, the Ivy City community has been plagued by the presence of numerous polluting facilities and discriminatory zoning laws, which have permitted these facilities to remain in operation despite their hazardous and toxic emissions into a densely populated area.[3]

3. National Engineering Products, which opened in 1937 and began production of industrial sealants and adhesives in 1938, is one such facility. Specifically, NEP produces two products: Nepseal 30, a flame-resistant sealant, and Copaltite, a sealant used on propulsion turbines. The production of these materials causes noxious and toxic fumes that can be smelled for blocks around the manufacturing facility.

---

[1] Empower DC, Ivy City Community Organizing (Apr. 11, 2024), https://www.empowerdc.org/ivy_city_community_organizing.

[2] Id.

[3] Although only 5% of D.C.'s land is zoned for industrial use, Ward 5 (where Ivy City is located) has nearly half of the industrially zoned land in the city, comprising approximately 15% of Ward 5's land use. See Vincent C. Grey, Ward 5 Works: The District of Columbia Ward 5 Industrial Land Transformation Study, D.C. Off. of Planning (2014)

4. NEP began operation before environmental standards, such as the Clean Air Act, 42 U.S.C. §§ 7401–7671q, were created to protect people from toxic air pollutants. As a result, NEP ignores industry standards, evades regulation and is not subject to the standards the U.S. Environmental Protection Agency ("EPA") sets for new sources and has no permits under the Act. Similarly, there are no District laws that apply to NEP or require them to engage in practices to ensure safe emissions.

5. The Scott family home shares a wall with NEP causing exposure-related adverse physical and mental health effects for her and her children for over 13 years, including loss of smell, asthma symptoms, skin irritation and anxiety.

JURISDICTION AND VENUE

6. This court has subject matter jurisdiction over the claims and allegations in this Complaint pursuant to D.C. Code § 11-921(a)(2).

7. This court has personal jurisdiction over the Defendant pursuant to D.C. Code § 13-423(a)(1) because Plaintiffs' claims arise from Defendant's transacting business in the District of Columbia.

8. Venue is proper because Defendant regularly conducts business in the District of Columbia and the events giving rise to the Plaintiffs' claims occurred in the District of Columbia.

PARTIES

9. Plaintiff Shawn Scott is an individual residing at 1948 Capitol Avenue Northeast, Washington, D.C. She is an adult resident of the District of Columbia.

10. Plaintiff W.S., the minor child of Shawn Scott, is a District resident. He was between 9 days old and 14 years old during the time relevant to this action.

11. Plaintiff E.S., the minor child of Shawn Scott, is a District resident. He was between newborn and eight years old during the time relevant to this action.

12. Plaintiff S.S., the minor child of Shawn Scott, is a District resident. She was between newborn and five years old during the time relevant to this action.

13. Plaintiff David Bing is an individual residing at 1948 Capitol Avenue Northeast, Washington, D.C. He is an adult resident of the District of Columbia.

14. Plaintiff Isaiah Neal is an individual residing at 1341 Congress Street Southeast, Washington, D.C. He is an adult resident of the District of Columbia. He resided at the property located at 1948 Capitol Avenue Northeast from December 2012 until 2021 and from 2022 until 2023.

15. Plaintiff Joshua Neal is an individual residing at 1948 Capitol Avenue Northeast, Washington, D.C. He is an adult resident of the District of Columbia.

16. Defendant, National Engineering Products, Incorporated., is a Maryland-incorporated company. The primary operation location of NEP is 1950 Capitol Avenue Northeast, Washington, D.C.

FACTS

17. Plaintiff Shawn Scott purchased the 4-bedroom, 3-bathroom residence located at 1948 Capitol Avenue Northeast in the District of Columbia on December 12, 2011, for her family, including her six children, using both personal and District grant funds for first time homebuyers.

18. The Scott Family home was purchased for approximately $210,000.

19. The neighborhood is in a Residential Flat zone, which prioritizes residential use but allows for limited compatible non-residential uses.

20. At no point during the home purchasing process was Plaintiff informed that her neighbor, NEP, produces chemicals that emit toxic and noxious fumes.

21. Plaintiff E.S was born in July 2016 and Plaintiff S.S. was born in February 2020, after the family had moved into the residence.

22. Soon after the Scott Family moved into the residence, they began to notice the pervasive smell of burning rubber. The smell persists to this day.

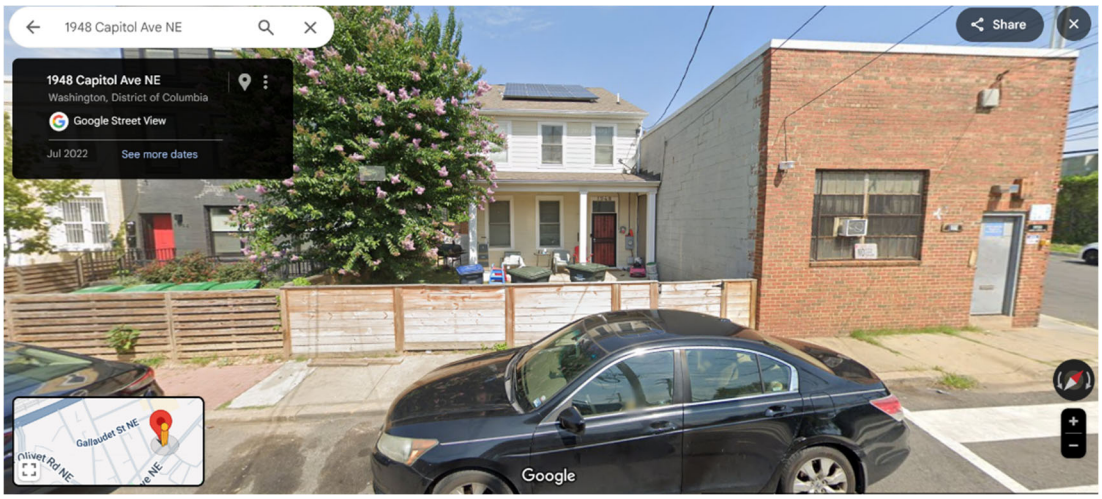
23. It was not until a community meeting in December 2019 that the Scott Family realized that the smell was coming from their neighbor, NEP. The Scott Family and other Ivy City residents learned at that meeting that the decades long onslaught of foul odors, asthma, headaches, nosebleeds and other respiratory symptoms originated from NEP.

24. In addition to the steady stream of air pollution, a tree on NEP's property started leaning into Plaintiff's property and took off the top of the Scott Family's shed.

25. In or around April 2025, NEP began idling industrial trucks in the rear yard directly adjacent to the Scott Family property, further contributing to the industrial pollution exposure of the Scott Family.

National Engineering Products

26. NEP is in a building at the end of a section of residential rowhomes on Capital Avenue Northeast and nearby a commercial district on Fenwick Street Northeast. The property shares a wall with the Scott Family home. The front of the building is the main entrance with a double window and single-entry door. The Fenwick Street side of the building has a large garage door towards the rear of the building, with seven large windows in between. There are three vents on the roof of the facility. One of these vents lets out exhaust fumes right into W.S. and E.S's bedroom, which was previously Isaish's bedroom.



27. NEP, which began operating in Ivy City in 1938, manufactures Nepseal 30 and Copaltite, adhesives that have been utilized by the United States Navy. NEP manufactured Pattern Release 202 until 2018; however, it still stores the product in the facility.

28. NEP produces Nepseal 30 and Copaltite twice monthly, which causes odor emissions during the manufacturing process. However, odors and fumes linger even when the facility is not actively manufacturing Nepseal 30 and Copaltite.

29. The products manufactured and stored at NEP are extremely flammable. Combustion of these products and chemicals can lead to the release of toxic chemicals.

30. Nepseal 30 is a flame-resistant sealant composed primarily of aluminum hydroxide and C18 unsaturated fatty acids trimers with fiberglass.

31. Copaltite is a sealant used on propulsion turbines and is composed of mixed cresols, kaolin, phenols, formaldehyde, and methyl alcohol. The sealant also has trace elements of lead, mercury, sodium, copper, fluorine, phosphorous, chlorine, and sulfur.

32. The production of Copaltite requires mixing formaldehyde and other phenols in an open vat. During this process, NEP leaves the vats open and pumps the fumes out of a window directly next to the Scott Family residence.

33. Upon information and belief, the production of Nepseal 30 also requires the mixing together of hazardous materials that emit noxious odors.

34. NEP is aware that its activities result in harmful emissions in a predominantly Black residential neighborhood. NEP itself has published information about the hazards posed by its products.

35. In 2015, NEP released "Safety Data Sheets" for the products it manufactures. In one such Safety Data Sheet, NEP describes Nepseal 30 as causing mild skin, eye, and respiratory tract irritation.[4]

36. In another Safety Data Sheet, NEP identified Copaltite's known side effects include cancer, genetic defects, organ damage, burns, and eye damage. If inhaled, Copaltite may also cause respiratory irritation.[5]

37. In 2022, the District of Columbia Department of Energy & Environment ("DOEE") performed air quality testing in and around NEP.[6] The tests found that concentrations of formaldehyde, acetronitrile, and methylene chloride were all above screening levels. These compounds can cause difficulty breathing and are linked to cancer.[7]

38. As a result of NEP's emissions, the Scott Family has suffered adverse health effects and is unable to enjoy their property.

---

[4] See Nat'l Eng'g Prods., Safety Data Sheet: Nepseal 30, http://raheen50.tripod.com/sitebuildercontent/sitebuilderfiles/nepi-002_final.pdf (last visited June 6, 2025).

[5] See Nat'l Eng'g Prods., Safety Data Sheet: Copaltite https://www.copaltite.com/pub/media/amasty/amfile/attach/9kzCrclK82OFAl8JdODrp7X8scpBtmSi.pdf (last visited June 6, 2025).

[6] D.C. Dep't of Energy & Env't, Air Quality Testing Results for National Engineering Products, https://doee.dc.gov/service/air-quality-testing-results-national-engineering-products (last visited June 6, 2025).

[7] Id.

2018 Fire at NEP

39. At or around 11:00 am on October 4, 2018, there was a fire inside NEP causing the release of black smoke.

40. Plaintiff Shawn Scott awoke to someone at her door yelling that NEP was about to blow up. The Scott Family evacuated to avoid being harmed by the fire.

41. Plaintiff Shawn Scott was hospitalized and treated for smoke inhalation.

42. On October 4, 2018, The Washington D.C. Fire and EMS Department prepared an Incident Report. The Incident Report narrative noted that "chemical product containers were . . . found open. The chemical product was present all over the area."

43. The fire damaged at least one of the rooftop vents. Upon information and belief, the vent has never been repaired. This has allowed even more fumes to be released into the Scott Family home.

44. The fire led to severe smoke damage throughout the Scott Family residence, as well as chemical residue on the walls.

45. Since the fire, NEP has not repaired damage to the structure of the building, which has allowed even more fumes to seep into the Scott Family residence.

46. Plaintiff Shawn Scott has filed complaints with the District of Columbia Department of Buildings and the District of Columbia Department of Licensing and Consumer Protection about NEPs failure to address and repair the fire damage.

Harm to The Scott Family

47. The Scott family has experienced severe and ongoing medical complications and mental anguish since moving into the residence.

48. In 2012, shortly after moving into the home, Shawn Scott lost her sense of smell. Doctor after doctor gave her potential solutions, including nasal sprays and other prescriptions, but nothing worked. She ultimately underwent maxillofacial surgery in 2018 to reduce the size of a nasal gland in hopes of recovering her sense of smell with limited success. She still has not fully recovered her full sense of smell.

49. Shawn Scott also suffers from severe headaches.

50. In addition to this physical harm, Shawn Scott continues to endure severe emotional distress and anxiety due to the Defendant's actions. She lives in fear that each day her family's health deteriorates as a direct result of the Defendant's fumes. Her anxiety that her children have suffered irreversible harm only grows as Defendant persists in operating without care to its neighbors.

51. Shawn Scott is constantly fearful of allowing her children to play outside because of the fumes from NEP. She is also fearful of allowing her children to remain in the home because of the unavoidable and prolonged exposure to NEP's fumes inside the home.

52. E.S. and S.S. were born after the family moved into the home and are showing signs of learning disabilities, unlike their siblings who did not spend their early years in the home. E.S. and S.S. miss school constantly due to illness and flare-ups, further hindering their development.

53. W.S. has persistent nosebleeds and swollen sinuses.

54. S.S. has swelling inside her nasal cavity.

55. David Bing suffers from persistent bloody noses, headaches and restlessness. As a child, he stopped going outside because the smell was so pervasive that it gave him headaches.

56. Isaiah Neal experiences difficulty breathing, shortness of breath and migraines. These symptoms would dissipate when he was not in the home and would reappear upon his return.

57. Joshua Neal has severe asthma, which worsened after the Scotts moved into the home. He experiences worsening asthma symptoms and heaviness of his eyes, both of which dissipate when he is not in the home and reappear upon his return.

58. The Scott Family will also be unable to sell the property at a profit as a result of NEP's growing reputation for causing harm. NEP has not adjusted its practices despite Plaintiffs and other Ivy City residents advocating for cleaner air and has received media attention as a result.

CLAIMS

Count I
Private Nuisance

59. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–58.

60. District law defines nuisance as "a substantial and unreasonable interference with private use and enjoyment of one's land [or property]." See Nat'l Te. Co-op. Ass'n v. Exxon Corp., 38 F. Supp. 2d 1, 14 (D.D.C. 1998) (quoting Restatement (Second) of Torts § 821 D (1979)).

61. As a direct and proximate cause of Defendant's manufacturing and storage practices, Plaintiffs suffered and continue to suffer damages resulting from the emission of noxious and toxic fumes, *inter alia*, financial loss, personal injuries, emotional distress, loss of private use and enjoyment of their property, interference with the physical condition of their residence and continued exposure to toxic and noxious odors from Defendant's operations.

62. The nuisance created and contributed to by Defendant is substantial and unreasonable. It has caused, continues to cause, and will continue to cause far into the future, significant harm to Plaintiffs.

63. Because of their knowledge of manufacturing procedures, and their position in controlling the manufacturing process, Defendant was in the best position to prevent the nuisance,

but failed to do so, including failing to warn Plaintiffs of the risks posed by their manufacturing process.

64. Defendant controlled the instrumentality of the nuisance of the time of the nuisance as the only manufacturer in the District of Columbia of Nepseal 30 and Copaltite and by controlling every step of the manufacturing process.

65. Defendant's wrongful conduct exhibited a wanton or willful disregard for the rights of Plaintiffs. Defendant has actual knowledge that their products and the manufacturing process of those products are toxic, noxious, and emit toxic and noxious fumes into Plaintiffs' adjacent residence.

66. Further, Defendant has actual knowledge that their manufacturing process is causing and contributing to the nuisance and acted with conscious disregard for the probable dangerous consequences of their conduct's and product's foreseeable impact upon the rights of others, including Plaintiffs.

67. As a separate basis for the claim of private nuisance, Defendant's negligence in relation to its continuous operation of its manufacturing site caused the nuisance and thus the Scott Family's resulting and ongoing harm.

68. Accordingly, Plaintiffs respectfully request that this Court enjoin Defendant from continuing to manufacture any chemicals known to emit noxious and toxic fumes, including, but not limited, to Nepseal 30 and Copaltite and award Plaintiffs compensatory and punitive damages for Defendant's acts of nuisance.

Count II
Public Nuisance

69. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–68.

70. Public nuisance is actionable by a private party when they have suffered "special damage, distinct from that common to the public." See Nat'l Tel. Coop. Ass'n, 38 F. Supp. 2d at 13.

71. The public nuisance caused, contributed to, maintained and/or participated in by Defendant has caused and/or imminently threatens to cause injury to Plaintiffs. Plaintiffs have suffered unique harms of a kind that are different from District residents at large, namely Plaintiffs have been harmed in their property interest and adverse health effects. The public nuisance has caused and/or imminently threatens to cause substantial injury to real and personal property directly owned by the Plaintiffs, as well as physical injuries to Plaintiffs.

72. As a direct and proximate cause of Defendant's manufacturing practices, Plaintiffs suffered and continue to suffer damages resulting from the emission of noxious and toxic fumes, *inter alia*, financial loss, personal injuries, emotional distress, loss of private use and enjoyment of their property, interference with the physical condition of their residence and continued exposure to toxic and noxious odors from Defendant's operations.

73. The nuisance created and contributed to by Defendant is substantial and unreasonable. It has caused, continues to cause, and will continue to cause far into the future, significant harm to Plaintiffs.

74. Because of their knowledge of manufacturing procedures, and their position in controlling the manufacturing process, Defendant was in the best position to prevent the nuisance, but failed to do so, including failing to warn Plaintiffs of the risks posed by their manufacturing process.

75. Defendant controlled the instrumentality of the nuisance of the time of the nuisance as the only manufacturer in the District of Columbia of Nepseal 30 and Copaltite and by controlling every step of the manufacturing process.

76. Defendant's wrongful conduct exhibited a wanton or willful disregard for the rights of Plaintiffs. Defendant has actual knowledge that their products and the manufacturing process of those products are toxic, noxious, and emit toxic and noxious fumes into Plaintiffs' adjacent residence.

77. Further, Defendant has actual knowledge that their manufacturing process is causing and contributing to the nuisance and acted with conscious disregard for the probable dangerous consequences of their conduct's and product's foreseeable impact upon the rights of others, including Plaintiffs.

78. Accordingly, Plaintiffs respectfully request that this Court enjoin Defendant from continuing to manufacture any chemicals known to emit noxious and toxic fumes, including, but not limited, to Nepseal 30 and Copaltite and award Plaintiffs compensatory and punitive damages for Defendant's acts of nuisance.

Count III
Trespass

79. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–78.

80. Under District law, trespass is "an unauthorized entry onto property that results in interference with the property owner's possessory interest therein." Sarete, Inc. v. 1344 U St. Ltd. P'ship, 871 A.2d 480, 490 (D.D.C. 2005).

81. Defendant caused the entry of noxious and toxic fumes onto Plaintiffs' property and into Plaintiffs' residence, which caused serious and substantial damage to Plaintiffs' real and personal property.

82. This unlawful entry has seriously interfered with Plaintiffs' property rights.

83. Accordingly, Plaintiffs respectfully request that this Court enjoin Defendant from continuing to manufacture any chemicals known to emit noxious and toxic fumes, including, but not limited, to Nepseal 30 and Copaltite and award Plaintiffs compensatory and punitive damages for Defendant's acts of nuisance.

Count IV
Strict Liability

84. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–83.

85. Defendant's manufacturing and storage of toxic chemicals causes the emission of toxic and noxious fumes.

86. Specifically, Defendant's production of Nepseal 30 and Copaltite releases noxious and toxic fumes, which are inherently dangerous for the general public to inhale.

87. This production is not a common activity and presents risks to surrounding areas.

88. This practice is especially dangerous in a densely populated residential neighborhood, where the facility shares a wall with a private residence.

89. Accordingly, Plaintiffs respectfully request this Court enjoin Defendant from continuing to manufacture any chemicals known to emit noxious and toxic fumes, including but not limited to Nepseal 30 and Copaltite and award Plaintiffs compensatory and punitive damages for harm caused by these emissions.

Count V
Battery

90. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–89.

91. Under District law, civil battery is an intentional act that causes harmful or offensive bodily contact. See Evens-Reid v. District of Columbia, 930 A.2d 930, 937 (D.C. 2007) (quoting Jackson v. District of Columbia, 412 A.2d 948, 955 (D.C. 1980)).

92. Defendant is aware that the production of Nepseal 30 and Copaltite and storage of Pattern Release results in the emission of toxic and noxious fumes.

93. Plaintiffs have suffered long-term physical and mental health effects as the direct result of Defendant's manufacturing practices, specifically the emission of fumes from, including, but not limited to loss of smell; asthma and other respiratory damage; developmental delays; and anxiety.

94. Accordingly, Plaintiffs respectfully request that this Court permanently enjoin Defendant from continuing to manufacture and store any chemicals known to emit noxious and toxic fumes, including, but not limited, to Nepseal 30, Copaltite and Pattern Release and award Plaintiffs compensatory and punitive damages for Defendant's battery.

Count VI
Negligence

95. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–94.

96. Under District law, civil negligence is when: (1) the defendant owes a duty to the plaintiff; (2) the defendant breaches that duty; and (3) injury to the plaintiff was proximately caused by the breach. See *Hedgepeth v. Whitman Walker Clinic*, 22 A.3d 789, 793 (D.C. 2011).

97. Defendant is aware that the production of Nepseal 30 and Copaltite and the storage of Pattern Release results in the emission of toxic and noxious fumes.

98. Defendant owed Plaintiffs the general duty to be reasonable in its undertakings, including in its undertaking of producing and storing chemicals.

99. It was foreseeable to a reasonable person that production of Nepseal 30 and Copaltite and the storage of Pattern Release would cause injury to Plaintiffs, given that they reside immediately adjacent to Defendant's facility.

100. Defendant failed to take reasonable measures necessary to prevent foreseeable harm to Plaintiffs, and Defendant unreasonably failed to take basic safety precautions to prevent harm from its production and storage activities.

101. Defendant owed a duty to Plaintiffs to prevent their harmful exposure to the emission of toxic and noxious fumes related to Defendant's business.

102. Plaintiffs have suffered long-term physical and mental health effects as the direct result of Defendant's manufacturing practices, specifically the emission of fumes, including, but not limited to loss of smell; asthma and other respiratory damage; developmental delays; and anxiety.

103. Accordingly, Plaintiffs respectfully request that this Court permanently enjoin Defendant from continuing to manufacture and store any chemicals known to emit noxious and toxic fumes, including, but not limited to, Nepseal 30, Copaltite, and Pattern Release and award Plaintiffs compensatory and punitive damages for Defendant's negligence.

104. Plaintiffs' claim of negligence is limited to injuries that arose on or after June 16, 2022.

Count VII
Negligent Infliction of Emotional Distress

105. Plaintiffs reallege and incorporate by reference the allegations in paragraphs 1–104.

106. As a direct and proximate result of Defendant's negligent and reckless chemical production processes, Plaintiffs experienced severe and verifiable emotional distress, including, but not limited to, anxiety and loss of sleep.

107. Accordingly, Plaintiffs respectfully request this Court award Plaintiffs compensatory and punitive damages for Defendant's negligent infliction of emotional distress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Shawn Scott, W.S., E.S., S.S, David Bing, Isaiah Neal and Joshua Neal respectfully requests that this Court enter judgement against Defendant on all counts and grant the following relief:

a. Declare that Defendant's conduct, as alleged above, constitutes a private nuisance;

b. Declare that Defendant's conduct, as alleged above, constitutes a public nuisance;

c. Declare that Defendant's conduct, as alleged above, constitutes trespass;

d. Declare that Defendant is strictly liable for Plaintiffs injuries;

e. Declare that Defendant's conduct, as alleged above, constitutes battery;

f. Declare that Defendant's conduct, as alleged above, caused negligent infliction of emotional distress to Plaintiffs;

g. Enjoin Defendant permanently and during the pendency of this action from further production and storage of chemicals known to emit noxious and toxic fumes, including, but not limited to, Nepseal 30, Copaltite and Pattern Release;

h. Award compensatory and punitive damages for Defendant's private nuisance;

i. Award compensatory and punitive damages for Defendant's public nuisance;

j. Award compensatory and punitive damages for Defendant's trespass onto Plaintiffs' property;

k. Award compensatory and punitive damages for Defendant's strict liability;

l. Award compensatory and punitive damages for Defendant's battery on Plaintiffs;

m. Award compensatory and punitive damages for Plaintiffs' emotional distress;

n. Award costs and attorneys' fees in this action;

o. Award prejudgment interest; and

p. Any other relief this Court deems appropriate.

JURY DEMAND

Pursuant to D.C. Rule of Civil Procedure 38, Plaintiffs request a trial by jury on all claims.

Respectfully submitted,

/s/ Phylicia H. Hill
Phylicia H. Hill, D.C. Bar #90020163
Inka Boehm, D.C. Bar #90005524
Kaitlin Welborn, D.C. Bar #88187724
Legal Aid D.C.
1331 H Street, N.W., Suite 350
Washington, D.C. 20005
Tel.: (202) 661-5960
Fax: (202) 727-2132
phill@legalaiddc.org

Attorneys for Plaintiffs

Dated: July 16, 2025