

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

FREEDOM WATCH, INC, et al

Plaintiffs,

v.

GOOGLE, INC, et al

Defendants.

1:18-cv-02030

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiffs Freedom Watch, Inc. and Laura Loomer (“Plaintiffs”) respectfully move this Court for leave to amend its Complain pursuant to Federal Rules of Civil Procedure 15(a). The amendment is attached hereto as Exhibit 1.

FRCP Rule 15(a) provides that leave to amend shall be freely given when justice requires. “Leave to amend a complaint should be freely given in the absence of undue delay, bad faith, undue prejudice to the opposing party, repeated failure to cure deficiencies, or futility.” *Richardson v. United States*, 193 F.3d 545, 548-49 (D.C. Cir. 1999). The U.S. Supreme Court has declared that “this mandate is to be heeded.” *Foman v. Davis*, 371 U.S. 178, 182 (1962); *Davis v. Liberty Mut. Ins. Co.*, 871 F.2d 1134, 1136 (D.C. Cir. 1989).

Here, Plaintiffs are moving to amend in order to add a new Plaintiff, Ms. Laura Loomer, who has only recently suffered her injury as a direct and proximate result of Defendants’ illegal conduct. The amendment also incorporates newly discovered facts, as well as moots out factually certain arguments contained in Defendants’ Motion to Dismiss. This will save the Court and the parties time, expense, and other resources and allow this case to proceed expeditiously to discovery.

WHEREFORE, Plaintiffs Freedom Watch Inc. and Ms. Loomer respectfully request that this Court grant leave to amend the operative Complaint in this matter.

Dated: November 28, 2018

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.

Chairman and General Counsel

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Attorney for Freedom Watch, Laura Loomer,
and the Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed November 28, 2018 and served to all counsel of record through the Court's ECF system.

/s/ Larry Klayman

Attorney