## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION No. 7:23-cv-01576

EDGAR ALLEN PETERSON, IV,	)	
Plaintiff,	)	
v.	)	
UNITED STATES OF AMERICA,	)	
Defendant	)	

## PLAINTIFF'S MOTION FOR EXPEDITED TRIAL

Pursuant to Federal Rules of Civil Procedure 1 and 16, Local Rule 40.1(d), and 28 U.S.C. § 1657(a), undersigned counsel for the Plaintiff Edgar Allen Peterson, IV (the "Plaintiff") moves the Court to expedite Mr. Peterson's trial because he has progressing Parkinson's disease that impacts his ability to communicate. Plaintiff respectfully requests the Court schedule Mr. Peterson's trial within 120 days of this motion. The Plaintiff and Plaintiffs' Leadership Group is ready and able to present his case.

In support of this Motion, the Plaintiff submits and relies upon its accompanying Memorandum in Support and exhibits attached thereto.

DATED this 30<sup>th</sup> day of April, 2024.

<u>/s/ J. Edward Bell, III</u> J. Edward Bell, III (admitted pro hac vice) Bell Legal Group, LLC 219 Ridge St. Georgetown, SC 29440 Telephone: (843) 546-2408 jeb@belllegalgroup.com *Counsel for Plaintiff*  <u>/s/ James A. Roberts, III</u> James A. Roberts, III (N.C. Bar No.: 10495) Lewis & Roberts, PLLC 3700 Glenwood Avenue, Suite 410 P. O. Box 17529 Raleigh, NC 27619-7529 Telephone: (919) 981-0191 Fax: (919) 981-0199 jar@lewis-roberts.com *Counsel for Plaintiff*  <u>/s/ A. Charles Ellis</u> A. Charles Ellis (N.C. Bar No.: 010865) Ward and Smith P.A. Post Office Box 8088 Greenville, NC 27835-8088 Telephone: (252) 215-4000 ace@wardandsmith.com *Counsel for Plaintiff*  <u>/s/ John F. Romano</u> John F. Romano (admitted pro hac vice) Romano Law Group 1601 Belvedere Road, Ste. 500-S West Palm Beach, FL 33416 Phone: (561) 533-6700 John@romanolawgroup.com marjorie@romanolawgroup.com FL Bar No.: 175700 *Counsel for Plaintiff* 

## **CERTIFICATE OF SERVICE**

I, J. Edward Bell, III, hereby certify that the foregoing document was electronically filed on the Court's CM/ECF system on this date, and that all counsel of record will be served with notice of the said filing via the CM/ECF system.

This the 30<sup>th</sup> day of April, 2024.

<u>/s/ J. Edward Bell, III</u> J. Edward Bell, III