

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

JOHN LOUIS FREEMAN, SR., )  
)  
Plaintiff, )

Civil Action No. 2:17-cv-00330

v. )

VIRGINIA DEPARTMENT OF )  
CORRECTIONS; HAROLD W. CLARKE, )  
Director of the Virginia Department of )  
Corrections in his individual and official )  
capacities; KENNETH W. STOLLE, Sheriff )  
of the City of Virginia Beach in his individual )  
and official capacities; JOHN DOE(S) 1-10, )  
employees of the Virginia Department of )  
Corrections or the Virginia Beach Corrections )  
Center in their individual and official )  
capacities, )

Defendants. )

**RESPONSE TO MOTION TO DISMISS  
AND STATUS REPORT TO COURT**

On August 22, 2017, Plaintiff John Louis Freeman moved for an extension of the deadline for him to respond to the motion to dismiss filed by the Virginia Department of Corrections and Director Clarke on the ground that Freeman was in discussions with VDOC and Director Clarke that could result in a resolution of the claims against them. Doc. #19. The Court granted the extension, but noted there would be no further extensions. Doc. #20.

Since the extension, the parties have continued to discuss and meet in order to resolve the issues between them. Yesterday the parties discussed an agreement under which Freeman would voluntarily dismiss his Complaint. However, Freeman’s counsel need to consult with their client to obtain his consent before they can effectuate the dismissal. Counsel anticipates being able to do that within five business days.

Dated: September 22, 2017

/s/ William H. Wright Jr.  
Maya M. Eckstein (VSB No. 41413)  
William H. Wright Jr. (VSB No. 25576)  
HUNTON & WILLIAMS LLP  
Riverfront Plaza-East Tower  
951 East Byrd Street  
Richmond, Virginia 23219-4074  
Phone: (804) 788-8209  
Fax: (804) 788-8218  
[meckstein@hunton.com](mailto:meckstein@hunton.com)  
[cwright@hunton.com](mailto:cwright@hunton.com)

*Counsel for Freeman*

**CERTIFICATE OF SERVICE**

I certify that on September 22, 2017, I caused an accurate copy of the foregoing document to be filed with the Clerk of Court using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ William H. Wright Jr.  
William H. Wright Jr. (VSB No. 25576)  
HUNTON & WILLIAMS LLP  
Riverfront Plaza-East Tower  
951 East Byrd Street  
Richmond, Virginia 23219-4074  
Phone: (804) 788-8209  
Fax: (804) 788-8218  
[cwright@hunton.com](mailto:cwright@hunton.com)

*Counsel for Freeman*

*Counsel to Plaintiff John Louis Freeman, Sr.*