

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

THOMAS A. SPECIALE, II,

Plaintiff,

v.

CASE NO. CL23-499

DEMOCRATIC PARTY OF VIRGINIA,

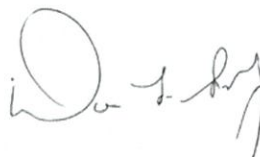
Defendants.

NOTICE AND MOTION PURSUANT TO § 30-5 OF THE CODE OF VIRGINIA

PLEASE TAKE NOTICE of the following:

1. The defendant, Democratic Party of Virginia, has retained Don Scott as counsel. Mr. Scott is a State Delegate representing the 88th District.
2. The General Assembly is presently in the 2025 Special Session of the General Assembly of Virginia.
3. The General Assembly, still being in session, and Mr. Scott being a member of the legislature, pursuant to § 30-5, the Defendant moves this Court to suspend any and all pleadings or the performance of any act relating thereto required to be filed or performed by any statute or rule during the period beginning 30 days prior to the present Special Session, and ending 30 days after the adjournment of the Special Session and that any pleadings or performance be extended to a period after the legislative session has been adjourned.
4. Pursuant to § 30-5 of Title 30, Chapter 1, this motion shall be granted by the Court, and the Defendant hereby moves for the entry of the attached Order.

DEMOCRATIC PARTY OF VIRGINIA



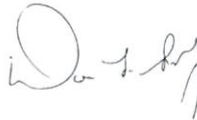
By _____
Of Counsel

Don Scott (VSB No. 88725)
Jeffrey A. Breit (VSB No. 18876)
Allen W. Beasley (VSB No. 24730)
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Counsel for the Democratic Party of Virginia

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of September, 2025, a true and correct copy
of the foregoing Notice and Motion was mailed and e-mailed to the following:

Thomas A. Speciale, II
14940 Grassy Knoll Court
Woodbridge, VA 22193
tom.speciale@thomasspeciale.com



Don Scott