

IN THE
SUPREME COURT OF THE UNITED STATES

RYAN THORNELL, et al.,

Applicants,

v.

SHAWN JENSEN, et al.,

Respondents.

REPLY BRIEF IN SUPPORT OF APPLICATION TO STAY THE ORDER
ISSUED BY THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF ARIZONA

KRISTIN K. MAYES

Arizona Attorney General

JOSHUA D. BENDOR

Solicitor General

LUCI D. DAVIS

OFFICE OF THE

ARIZONA ATTORNEY GENERAL

2005 N. Central Avenue

Phoenix, Arizona 85004

MARY R. O'GRADY

ANDREW G. PAPPAS

JOHN BULLOCK

DANIEL BOWMAN

OSBORN MALEDON, P.A.

2929 N. Central Avenue, Suite 2000

Phoenix, Arizona 85012

PAUL D. CLEMENT

Counsel of Record

ANDREW C. LAWRENCE

BARRETT L. ANDERSON*

CLEMENT & MURPHY, PLLC

706 Duke Street

Alexandria, VA 22314

(202) 742-8900

paul.clement@clementmurphy.com

*Supervised by principals of the firm who
are members of the Virginia bar

Counsel for Applicants

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REPLY BRIEF

According to Plaintiffs, there is nothing to see here. Instead, Plaintiffs say, this Court should sit back and allow the district court to hand control of Arizona's prison healthcare system to a private receiver accountable only to the court and not the people of Arizona. Rather than preserve the status quo of state control while the Ninth Circuit "imminent[ly]" resolves an "expedited" appeal addressing the merits, Resp.34, Plaintiffs insist that the authority to run the State's prison healthcare system should be transferred to a private receiver, only to be retransferred back in the event that the State prevails in the Ninth Circuit or this Court. That position has nothing to recommend it. The far better course is to stay the challenged Orders and allow Arizona's politically accountable officials to continue to operate the State's own prison healthcare system pending further appellate proceedings.

Every stay factor supports that common-sense result, and Plaintiffs' submission only confirms as much. While Plaintiffs suggest that the Arizona Department of Corrections, Rehabilitation and Reentry ("Department") is unlikely to succeed on the merits, they do not meaningfully dispute that the district court skipped over less-intrusive remedies in violation of the Prison Litigation Reform Act ("PLRA") and bedrock principles of equity. Plaintiffs insist that this case is not certworthy, but they ignore the conflicts with this Court's precedents and that this Court regularly grants certiorari in cases involving important federalism issues even without that kind of conflict. Plaintiffs deny that the Department will suffer irreparable harm from the challenged Orders, but only because they do not recognize the loss of sovereign authority and political accountability as anything more than a

detail. And while Plaintiffs assert that the balance of equities favors them, they ignore that the public has no interest in unlawful and disruptive court orders—and that no one thinks the out-of-state receiver will be able to make immediate improvements, which is presumably why the district court gave the receiver five years to solve problems after giving the State only three years after the 2023 Injunction issued. The Court should grant the stay.

I. The Department Is Likely To Succeed On The Merits.

A. As a Matter of Law, the District Court’s Imposition of a Receivership Is Not the Least-Intrusive or Last-Resort Remedy Here, Violating Principles of Equity and the PLRA.

Plaintiffs acknowledge that the district court had a legal duty to impose the “least intrusive means necessary to correct the violation of the Federal right.” 18 U.S.C. §3626(a)(1)(A); *see* Resp.4. But they barely argue that the district court even attempted to comply with that standard or the equitable rule that a receivership must be a “remedy of last resort.” 75 C.J.S. *Receivers* §9 (Apr. 2026 update). And the district court plainly failed to comply with those rules when precipitously directing Arizona’s prison healthcare system into receivership. The Department thus is highly likely to succeed on the merits, and Plaintiffs cannot evade that conclusion by portraying the district court’s legal errors as “fact-bound” determinations entitled to deference. Resp.3, 14, 15, 16, 20.

1. The first fatal problem with the Orders here is that the district court imposed a receivership without first exhausting less-intrusive options to spur compliance with the 2023 Injunction, including the contempt-and-purge process. *See* Appl.18-20. Plaintiffs do not and cannot dispute that the contempt-and-purge process

is a less-intrusive remedy relative to the “nuclear option” of receivership. Liat Weingart, *Receiverships in the Prison Litigation Context: Factors Necessary for an Effective Judicial Remedy of Last Resort*, 9 Cardozo Pub. L. Pol’y & Ethics J. 193, 196 (2010). And Plaintiffs acknowledge (as they must) that “the district court did *not* first find [the Department] in contempt for noncompliance with the 2023 Injunction before appointing a receiver.” Resp.27 (emphasis added). By bypassing that step, the district court deprived the State of the kind of clear identification of specific shortcomings that the court wanted the Department to prioritize and an opportunity to redress those particular problems—an opportunity that is particularly necessary with the kind of sprawling, multi-subject injunction at issue here. That is sufficient to demonstrate that the Department is likely to succeed on the merits.

Plaintiffs attempt to sidestep that glaring problem by broadening the lens beyond the 2023 Injunction to encompass the 2014 Stipulation. *See* Resp.21-25, 26-27. But there are multiple problems with that effort. First, and most obviously, the 2023 Injunction is the “operative command” here, *Int’l Longshoremen’s Ass’n v. Phila. Marine Trade Ass’n*, 389 U.S. 64, 74 (1967), and “a conclusion that the court’s contempt power is ineffectual cannot be drawn until the court first exercises that power and sanctions fail to produce compliance with” that “underlying injunct[ion],” *Newman v. Alabama*, 683 F.2d 1312, 1320 n.18 (11th Cir. 1982). Worse still, the 2014 Stipulation expressly states that “Defendants deny all the allegations in the Complaint filed in this case” and that it “shall not be construed or interpreted as an admission of any wrongdoing or liability.” Dkt.1185 ¶5. Plaintiffs ignore that agreed-

upon language and insist (albeit, in a footnote) that the entry of the stipulation “necessarily required a finding of a constitutional violation.” Resp.23 n.4. But Plaintiffs do not explain what that purported “finding” entailed or identify where it is available for review, and that is unsurprising. When approving the 2014 Stipulation, the district court emphasized that it “can’t foresee what would have happened at trial” and that “there was litigation risk on both sides.” Dkt.1458, Attachment 2 at 30:4-7. And the district court ultimately held a 15-day bench trial in 2021 and issued a nearly 200-page decision with constitutional findings in 2022 precisely because it had never previously made any such findings.

Regardless, even accepting Plaintiffs’ dubious premise that the district court “crafted” the 2014 Stipulation and the 2023 Injunction “to address the same constitutional violations,” Resp.23, there is no denying that the district court’s craftsmanship materially differed in those two orders. The 2014 Stipulation established various agreed-upon “performance measures” while preserving the Department’s model of care. *See* Dkt.1185; App.24. By contrast, the 2023 Injunction is a device of “unusual scope” that required the Department to make “substantial” changes, imposed 154 substantive requirements, and replaced the Department’s model of care with a new one that involved a “wholesale shift” in approach. Dkt.4410 at 4-5, 11-50; Dkt.4761 at 1-2. The 2014 Stipulation and the 2023 Injunction thus are plainly not coextensive or interchangeable. Moreover, the sheer number of new substantive requirements imposed by the 2023 Injunction is precisely why it is so critical—and, under the PLRA and bedrock principles of equity, indispensable—that

the district court identify specific shortcomings worthy of contempt with an equally specific opportunity to purge. While Plaintiffs protest that “nothing in the record suggests” that the contempt-and-purge process would have worked, Resp.27, that improperly flips the burden. The PLRA and equity required the district court, before imposing a receivership, to find facts showing that contempt-and-purge could not have worked. The district court failed to do so. And even with the burden flipped, the record reveals that the Department now has “new leadership” that has access to more funding and a demonstrated commitment to “turn the tide.” *District of Columbia v. Jerry M.*, 738 A.2d 1206, 1214 (D.C. 1999) (per curiam). *Contra* Resp.24 (erroneously suggesting that the presence of new leadership is irrelevant).

Nor is contempt-with-opportunity-to-purge the only less-intrusive remedy that the district court impermissibly bypassed. As the Department explained, *see* Appl.19-20, the district court could have taken other less-intrusive steps, such as by providing the Department with the same six-month period given to the receiver to prepare an “operational plan” to prioritize and operationalize the 2023 Injunction’s scores of requirements. Plaintiffs assert that “it is wrong to insist that the district court did not, after 2023, try *anything else* before imposing a receivership,” observing that the court held “status conferences” and the like. Resp.25. That just proves the Department’s point: The requirement of the PLRA and equity is not merely to try something, but to exhaust all less-intrusive remedies before imposing the most “stringent” remedy known to law. *LaShawn A. ex rel. Moore v. Barry*, 144 F.3d 847, 854 (D.C. Cir. 1998). Holding a status conference does not begin to satisfy the law or

respect the sovereign prerogative of the State.

2. The district court also failed to abide by the least-intrusive-means and last-resort requirements by resorting to receivership even though the Department has made significant progress toward compliance since the entry of the 2023 Injunction. Plaintiffs resist the premise, claiming that “[t]here was very little progress to ignore.” Resp.28. But Plaintiffs ultimately do not dispute the evidence of improvement that the Department provided in the stay application, which shows that Arizona has doubled its prison healthcare funding; increased staffing by 56% and bedspace by 66%; successfully launched major new programs, including for medication-assisted treatment and Hepatitis C; and substantially increased offsite specialty-care appointments. *See* Appl.10-12, 21. Plaintiffs nonetheless suggest that this progress is immaterial because the district court’s “experts”—and thus the district court itself—still found the Department noncompliant with “85%” of the healthcare “Quality Indicators” in the 2023 Injunction. Resp.29-30. That is a testament both to the sheer number of requirements imposed by the 2023 Injunction and the district court’s unforgiving standard for compliance. Although Plaintiffs deny that the district court held the Department to an unfair “standard of 100% compliance,” Resp.30, the record confirms that it did just that. Quality Indicators are binary, so anything less than 100% compliance—yes, even 99.5% compliance—is deemed “noncompliant” by the district court. *See, e.g.*, App.149 (Department deemed in noncompliance of §3.1 of the 2023 Injunction despite 99.5% compliance); App.110 (same for §7.2 despite 96% compliance); App.116 (same for §11.1.5a despite 96%

compliance); App.117 (same for §11.1.5b despite 91% compliance); App.144 (same for §10.4.1 despite 96%); App.147 (same for §4.4d/e despite 97% compliance). That A- = F logic is absurd and ignores the factors (*e.g.*, progress and willingness to comply) that courts must consider before concluding that a State has failed entirely, such that a receivership is necessary. This underscores the need to put the sovereignty-invading Orders on hold pending appellate review.

Plaintiffs alternatively contend that the district court did “consider” the Department’s progress, but found it unavailing. Resp.29. Plaintiffs’ principal evidence of that so-called consideration is a single page in the Receivership Order that merely summarizes arguments made in the Department’s briefing. *See* Resp.28-29 (citing App.43 four times). The PLRA demands much more, as the Fifth Circuit agrees. *See Parker v. Hooper*, 171 F.4th 736, 757-58 (5th Cir. 2026) (*en banc*).

3. The district court further erred by imposing a receivership without giving the Department adequate time to comply with the 2023 Injunction. The district court pulled the plug on the Department not even three years into the compliance period, but nonetheless gave the receiver “five years,” at a minimum, to achieve compliance. App.18. Thus, by the district court’s own yardstick for the timeline for realistic progress, the district court was precipitous in wresting control from state officials.

Plaintiffs’ lead response is the familiar one that the district court in fact gave the Department “fourteen years” to achieve compliance. Resp.30. That is wrong for all the reasons already articulated. The relevant order is the 2023 Injunction, entered

after a trial. Dissatisfaction with the Department's performance under prior administrations pursuant to a materially different stipulation may explain the district court's frustration, but it does not excuse the court's failure to abide by the requirements of the PLRA and equity.

Plaintiffs' only other argument is that the Department's position "conflates how long it will take a receiver ... to remedy the constitutional violations ... with how long the district court needed to decide whether [the Department] would remedy them on their own." Resp.31. That argument does not advance the ball for Plaintiffs, as it is just another way of saying that the district court precipitously imposed a receivership after 34 months while knowing that the work would take at least 60 months. Simply put, nothing in Plaintiffs' submission disturbs the straightforward conclusion that the district court erred as a matter of law by precipitously imposing a receivership.

B. This Court's Decision in *CASA* Raises Serious Questions as to Whether Federal Courts Have Equitable Authority to Direct State Correctional Institutions Into Private Receivership Over the State's Objection.

Plaintiffs also fail to provide any comfort that a federal court even has authority to direct a state prison institution into private receivership over a State's objection. Plaintiffs do not dispute that this Court's decision in *Trump v. CASA, Inc.*, 606 U.S. 831 (2025), governs that question, which means that the receivership is valid only if that equitable remedy has a "founding-era antecedent." *Id.* at 847. Plaintiffs invoke the tradition of receiverships "dat[ing] back at least to sixteenth century England," Resp.18 n.3, but they do not dispute that early federal courts imposed

receiverships only in cases exclusively involving *private* parties and only then to preserve the integrity of certain property, *see* Appl.27-28. Nor do Plaintiffs identify any circumstance, ever, in which a federal court has imposed a comparable injunction over a Bureau of Prisons facility. The best that Plaintiffs can muster is a forthcoming law-review article to suggest that, “starting with our country’s inception, courts have exercised robust oversight over prisons.” Resp.18 n.3 (citing Con Reynolds, *The Judicial Role in Federal Imprisonment*, 175 U. Pa. L. Rev. 1, 16 (2027) (forthcoming)). True enough. But there are countless forms of oversight that fall short of a receivership, and Plaintiffs’ article is not to the contrary: It discusses *CASA* and receiverships a grand total of zero times.

Plaintiffs thus are left arguing that this case is “distinguishable from *CASA*” because “the ordered relief is not universal” and “Section 1983 affirmatively authorizes ‘suits in equity’ against state officials who violate federal rights.” Resp.17 n.3. But no one suggested that this case involved a universal injunction or that the analysis of *CASA* is limited to universal injunctions. That makes Plaintiffs’ conspicuous failure to identify any such Founding-era antecedent (or Reconstruction-era antecedent, for that matter) relevant. In all events, as the Department has explained, the PLRA and the bedrock principles of equity are sufficient to require reversal, wholly apart from *CASA*.

II. The Remaining Factors All Support A Stay.

Plaintiffs’ arguments regarding the remaining stay factors also come up short.

1. Plaintiffs insist that the Department’s application “does not present any legal issue that demands Supreme Court resolution.” Resp.16. That is wishful

thinking. The district court's order conflicts with this Court's precedents, and this Court frequently grants certiorari in cases involving important questions of federalism even without such a conflict. *See, e.g., Horne v. Flores*, 557 U.S. 433 (2009). And “[i]t is difficult to imagine an activity in which a State has a stronger interest ... than the administration of its prisons.” *Preiser v. Rodriguez*, 411 U.S. 475, 491-92 (1973). A case addressing the circumstances under which a federal court may appoint a private receiver to administer a state prison system over the State's objection—if such authority even exists, *but see* pp.8-9, *supra*—thus is plainly certworthy.

Plaintiffs next suggest that this case has two “glaring vehicle problems” that detract from certiorari. Resp.19. Those problems are illusory. The first purported vehicle problem is that the Ninth Circuit motions panel that denied the Department's request for a stay pending appeal “permitted the merits panel to revisit the stay,” which supposedly means that the denial is “not ... final.” Resp.19-20. Setting aside that this so-called vehicle problem does not relate to the question that the Court would address if it eventually grants certiorari, Plaintiffs face a judicial estoppel problem. They themselves just recently represented to the district court that the motions panel's order denying the stay “was a ‘resolution’ of the motion to stay” and thus is final. Dkt.5360 at 1. The district court agreed with that assessment and thus

announced that the receivership will begin on October 19. *See* Dkt.5363 at 3.¹ Plaintiffs cannot have it both ways.

The only other purported vehicle problem is that the Department supposedly “forfeited” the *CASA*-related argument regarding a federal court’s equitable authority to impose a receivership in these circumstances. Resp.19. Not so. The Department has pressed the argument in the stay proceedings. And as Plaintiffs agree, *see* Resp.17, it is teed up in the Ninth Circuit merits appeal too. It would thus be properly before this Court on any future petition for certiorari, which means that it is relevant at this stay stage. Plaintiffs’ forfeiture theory thus appears to hinge on the idea that the Department did not invoke *CASA* when opposing Plaintiffs’ receivership motion. But this Court had not even issued *CASA* at that time. And the Department claimed from the outset of the receivership proceedings that the district court had an obligation to select the “least intrusive” remedy here. Dkt.4818 at 8-9. Directing a nonconsenting state institution into receivership could not possibly qualify as the least-intrusive remedy even if such a remedy is within the federal judicial arsenal. *CASA* just underscores that such deeply intrusive orders may not even be within the judicial arsenal. Both arguments simply question the district court’s authority to issue the receivership order at issue here. The Department’s *CASA*-related argument thus is a “separate *argument*” in support of a single claim,” and nothing precludes the Department from raising it. *Yee v. City of Escondido*, 503 U.S. 519, 535 (1992).

¹ Plaintiffs also forget that a merits panel is always permitted to revisit a motions panel’s work. *See, e.g., Mi Familia Vota v. Fontes*, 111 F.4th 976, 981 n.1 (9th Cir. 2024).

2. Plaintiffs’ arguments regarding irreparable harm also miss the mark. Plaintiffs posit that the Department will not suffer such harm because the Department agrees that healthcare reforms are necessary, and the challenged Orders simply “change[] who carries out the work.” Resp.32. Contrary to Plaintiffs’ blithe suggestion, the question of “who” runs government operations is no trivial detail. “[P]revent[ing] *the Government* from enforcing its policies” is “irreparable harm” that is “enough to justify interim relief.” *CASA*, 606 U.S. at 859 (emphasis added). The challenged Orders do exactly that: Even though the State has determined that the Department is “best suited to the task” of implementing healthcare-related reforms in state prisons, *DHS v. League of Women Voters*, 2026 WL 2879700, at *3 (U.S. Sept. 25, 2026)—an area where the State has especially acute sovereignty interests, see *Preiser*, 411 U.S. at 491-92—the Orders instead transfer that responsibility to a private individual over the State’s objection.²

Plaintiffs nevertheless assert that the harm here is not irreparable because the “consequence of the receivership ... could ... be undone if [the Department] prevails” in the appeal. Resp.34-35. But the question here is whether the Department will suffer irreparable harm during the interim period before the appeal is decided. Plaintiffs do not explain how the Ninth Circuit could “compensat[e]” the State for the loss of sovereignty that it will suffer between October 19 and the end of appellate proceedings. Resp.34. That is because no such compensation exists. Indeed, that is

² Plaintiffs assert that “a State retains no sovereign interest in administering its prisons unconstitutionally.” Resp.33. But the Department is not challenging the 2023 Injunction requiring it to bring the prison healthcare system into constitutional compliance; it is challenging overreaching Orders that strip the Department of its authority to accomplish that objective.

why this Court has said that a State suffers irreparable injury “[a]ny time” that it is “disabled” from carrying out its policies during the pendency of an appeal—even if the period is only “several months.” *Maryland v. King*, 567 U.S. 1301, 1303-04 (2012) (Roberts, C.J., in chambers) (emphasis added); see *CASA*, 606 U.S. at 861.

Plaintiffs also do not meaningfully contest that the Department will suffer irreparable injury in the form of unrecoverable economic costs. The Receivership Order requires the Department to pay for the receivership, including for the receiver’s substantial salary and for costs associated with her staff and office. See App.14-16. Those are all extra costs that the State would not otherwise incur. *Contra* Resp.32 (incorrectly stating that “the costs ... are costs that the State’s compliance would incur in any event”). And Plaintiffs do not explain how the Department could ever realistically recoup those costs. Instead, Plaintiffs emphasize that the receiver can first tap \$2.2 million in pre-2023 Injunction “contempt fines” that are already set aside. Resp.35. But receiverships are generally far more expensive, see, e.g., Dkt.4818-1 Ex.9, and the Department need only establish that irreparable harm is “likely,” *Trump v. Cook*, 146 S.Ct. 2234, 2246 (2026).

3. Plaintiffs’ arguments regarding the balance-of-equities prong are weaker still. Plaintiffs do not dispute that the public has no interest in the implementation of an improper and PLRA-violating court order that wrests state functions away from accountable public officials and transfers them to an unaccountable private one. Nor do they dispute that the public has no interest in the

disruption and confusion that will inevitably accompany a back-and-forth transfer of authority.

Instead, Plaintiffs claim that a stay would “delay the Receiver’s needed remedial work.” Resp.39. But Plaintiffs concede that resolution of the Ninth Circuit appeal is “imminent,” Resp.34—in fact, just two days ago, the court of appeals calendared oral argument for December 7, *see* CA9.Dkt.34. At the same time, Plaintiffs must concede that the receiver’s takeover will not produce imminent or immediate results. To the contrary, Plaintiffs are insisting that the receiver needs five years to turn things around. Under those circumstances, practical and equitable considerations strongly favor retaining state control during the pendency of the appellate proceedings. There is no discounting the disruptiveness of transferring control on October 19 only to retransfer control if and when the Ninth Circuit or this Court sides with the State. The far better course is to enter a stay now during the brief interval for additional appellate proceedings.

CONCLUSION

The Court should grant a stay pending further appellate proceedings and issue a decision on the application by October 19, 2026.

Respectfully submitted,

September 29, 2026

KRISTIN K. MAYES
Arizona Attorney General
JOSHUA D. BENDOR
Solicitor General
LUCI D. DAVIS
OFFICE OF THE
ARIZONA ATTORNEY GENERAL
2005 N. Central Avenue
Phoenix, Arizona 85004

MARY R. O'GRADY
ANDREW G. PAPPAS
JOHN BULLOCK
DANIEL BOWMAN
OSBORN MALEDON, P.A.
2929 N. Central Avenue, Suite 2000
Phoenix, Arizona 85012

s/Paul D. Clement
PAUL D. CLEMENT
Counsel of Record
ANDREW C. LAWRENCE
BARRETT L. ANDERSON*
CLEMENT & MURPHY, PLLC
706 Duke Street
Alexandria, VA 22314
(202) 742-8900
paul.clement@clementmurphy.com

*Supervised by principals of the firm who are members of the Virginia bar

Counsel for Applicants