

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ALABAMA**

AMERICA’S FRONTLINE

DOCTORS, et al,

Plaintiffs,

v.

**The UNITED STATES OF
AMERICA; JOSEPH R. BIDEN, JR.,
et al,**

Defendants.

Case No. 2:21-cv-702-CLM

**MOTION FOR LEAVE TO FILE REVISED
AMENDED COMPLAINT**

Come now the plaintiffs, through their undersigned counsel, and respectfully move this Honorable Court for an order permitting the filing of the attached amended complaint in lieu of the amended complaint filed herein on October 29, 2021 (ECF 30). As grounds herefor, it is shown as follows:

1. The plaintiffs were granted until October 29, 2021, to file an amended complaint herein pursuant to this Court’s text order of October 18, 2021 (ECF 29);
2. In the week prior to October 29, three of plaintiffs’ lawyers (one being a WordPerfect computer program user and two being Word users) worked together to draft that amended complaint based on the original complaint filed herein;

3. In the late evening of October 29, apparently due to the differences between the WordPerfect and Word computer programs, such counsel were unable to delete certain features of the draft of the amended complaint and decided to file that amended complaint that had lined paper and no paragraphs;

4. The attached amended complaint is no longer on lined paper and has paragraphs numbered in conformity with Rule 10(b), F.R.Cv.P.

5. The differences between the attached amended complaint and ECF 30 consist of revising typographical errors and deleting one count of the amended complaint, ECF 30.

Wherefore, the premises considered, the Plaintiffs move the Court for an order permitting the filing of the attached amended complaint in lieu of ECF 30.

Respectfully submitted this the 4th day of November, 2021.

/s/ Lowell H. Becraft, Jr.
Lowell H. Becraft, Jr.
Attorney for Plaintiffs
ASB 5005-F66L
403C Andrew Jackson Way
Huntsville, AL 35801
256-533-2535
becraft@hiwaay.net

CERTIFICATE OF SERVICE

I hereby certify that on this date, November 4, 2021, I electronically transmitted this pleading to the Clerk of the Court using the CM/ECF system for filing, which will send notification of such filing to the following counsel for the Defendants:

Don B. Long, III AND Jason Cheek
Assistant United States Attorney United States Attorney's Office
Northern District of Alabama
1801 Fourth Avenue North
Birmingham, Alabama 35203

Isaac C. Belfer
U.S. Department of Justice
P.O. Box 386
Washington, D.C. 20044-0386

James W. Harlow
Trial Attorney, Consumer Protection Branch
Civil Division
U.S. Department of Justice
P.O. Box 386
Washington, D.C. 20044-0386

/s/ Lowell H. Becraft, Jr.
Lowell H. Becraft, Jr.