

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RONNIE E. WILLIAMS, SR, *et al.*,

Plaintiff,

v.

NATIONAL RAILROAD PASSENGER
CORPORATION,

Defendant.

Case No. 1:21-CV-01122-EGS

**DEFENDANT’S STATEMENT OF MATERIAL FACTS AS TO WHICH THERE IS NO
GENUINE DISPUTE IN SUPPORT OF ITS MOTION TO DISMISS, OR
ALTERNATIVELY, MOTION FOR SUMMARY JUDGMENT**

Defendant National Railroad Passenger Corporation (“Amtrak” or “Defendant”), by undersigned counsel, and pursuant to Rule 56 of the Federal Rules of Civil Procedure, Local Civil Rule 7(h) of this Court, as well as this Court’s Standing Order, submits its Statement of Material Facts As To Which There Is No Genuine Dispute in Support of Its Motion to Dismiss, or Alternatively, Motion for Summary Judgement.

| | |
|--|--|
| 1. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 2. [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 3. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 4. [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 5. [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 6. [REDACTED] | |

| | |
|---|--|
| [REDACTED] | |
| 7. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 8. [REDACTED] | |
| 9. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 10. [REDACTED] | |
| 11. [REDACTED] | |
| 12. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 13. [REDACTED] | |
| 14. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 15. [REDACTED] | |
| 16. [REDACTED] | |
| 17. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 18. [REDACTED] | |

| | |
|---|--|
| [REDACTED] | |
| 19. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 20. [REDACTED] is a named Plaintiff in this case. (ECF No. 47). | |
| 21. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 22. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 23. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |
| 24. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] | |

Dated: October 16, 2023

Respectfully submitted,

/s/ Joshua B. Waxman

Joshua B. Waxman Bar No. 482135

jwaxman@littler.com

Brandon R. Mita, Bar No. 986059

bmita@littler.com

LITTLER MENDELSON P.C.

815 Connecticut Avenue, NW, Suite 400

Washington, DC 20006

Telephone: 202.842.3400

Facsimile: 202.842.0011

Richard W. Black, Bar No. 467982

rblack@littler.com

LITTLER MENDELSON P.C.

3424 Peachtree Road, NE, Suite 1200

Atlanta, GA 30326

Telephone: 404.233.0330

Facsimile: 404.233.2361

Attorneys for Defendant

National Railroad Passenger Corporation