

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF FREDERICKSBURG

E.D. COLE BUILDING, L.L.C.)
and)
LOCAL HOLDINGS, L.L.C.,)
 Petitioners,)
v.)
)
COUNCIL OF THE CITY)
OF FREDERICKSBURG,)
And)
CITY OF FREDERICKSBURG)
 Defendants.)

Case No.: CL19-951

FILED

DEC 27 2019

**FREDERICKSBURG
CIRCUIT COURT**

MOTION FOR SUMMARY JUDGMENT

The City Council of the City of Fredericksburg (the “Council”), and the City of Fredericksburg (the “City”), Defendants, by counsel, respectfully move for summary judgment and ask the Court to enter a final judgment in their favor dismissing the Petition at Law for Declaratory Judgment, pursuant to Rules 1:1(d) and 3:20 of the Supreme Court of Virginia. As set forth in greater detail in the accompanying Brief in support of this Motion, the Council’s enactment of Resolution 19-100, “Granting a Certificate of Appropriateness for the Relocation of the Slave Auction Block to the Fredericksburg Area Museum,” was authorized, appropriate, and regular in all respects. No material facts are genuinely in dispute, and Defendants are entitled to judgment as a matter of law.

Respectfully submitted,

CITY COUNCIL OF THE
CITY OF FREDERICKSBURG

And

CITY OF FREDERICKSBURG

By: 
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Summary Judgment was hand delivered to counsel for Plaintiffs, named below, on this 27 day of December, 2019.

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A handwritten signature in black ink, appearing to read "JP Drennan", is written over a horizontal line.