IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES DEPARTMENT OF TREASURY Petitioner,)))
v.) No. 1:12-mc-00100-EGS
PENSION BENEFIT GUARANTY CORPORATION, Interested Party,)))
V.)
DENNIS BLACK, et al., Respondents.))) _)

RESPONDENTS' MOTION FOR HEARING ON PETITIONER'S MOTION TO QUASH

Respondents, by and through their undersigned counsel, respectfully request that the Court hold a hearing on the Treasury's Renewed Motion to Quash (DE 15). Counsel for the Treasury has stated that the Treasury does not oppose this motion. A statement of points and authorities in support of the motion is attached hereto.

Dated: December 9, 2013 Respectfully submitted,

/s/ Anthony F. Shelley
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STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION

Respondents have served two Rule 45 subpoenas upon the United States Department of the Treasury (the "Treasury") in connection with a lawsuit against the Pension Benefit Guaranty Corporation pending in the Eastern District of Michigan, *Black v. PBGC*, Case No. 09-13616 (the "Michigan Case"). The Treasury has moved to quash those subpoenas, and the parties have filed their briefs, with the Treasury's reply having been filed on November 19, 2013. *See* DE 15, 19, and 21.

In its reply brief, the Treasury raised new arguments. *See* DE 21 at 13-14. Respondents respectfully request that the Court schedule a hearing in connection with the Treasury's motion to quash, during which Respondents can address these new arguments and the parties can otherwise address any questions that the Court has about the pertinent issues. Respondents note that discovery in the Michigan Case (to which Respondents' Rule 45 subpoenas relate) currently is scheduled to close on February 1, 2014 (though the parties may seek or need to extend that date). Accordingly, Respondents seek as swift a resolution to this matter as is practicable for the Court.

Date: December 9, 2013 Respectfully submitted,

/s/ Anthony F. Shelley

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Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF users:

David M. Glass U.S. Dep't of Justice - Civil Division 20 Massachusetts Avenue, NW Washington, DC 20530 Email: david.glass@usdoj.gov

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/s/ Anthony F. Shelley

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v.)	
DENNIS BLACK, et al., Respondents.	
[PRO	OPOSED] ORDER
THIS MATTER, having come be	fore the Court on the Respondents' unopposed Motion
for Hearing,	
IT IS HEREBY ORDERED that	the Motion is GRANTED.
Counsel for Respondents will coo	ordinate with Counsel for Petitioner and provide the
Court with proposed dates for a hearing.	
SO ORDERED this day of _	, 2013.
	Emmet G. Sullivan