

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

LUCAS WALL <i>et al.</i>,	:	
	:	
Petitioners,	:	
	:	Consolidated
v.	:	Case Nos. 21-1220, 1221,
	:	1225, 1236, 1237, & 1258
TRANSPORTATION SECURITY	:	
ADMINISTRATION,	:	
	:	
Respondent.	:	

**UNOPPOSED MOTION FOR LEAVE TO FILE
AMICUS CURIAE BRIEF AFTER DEADLINE**

COME NOW *amici curiae* Tyson D. Gabriel, David M. Howard, and Stephen E. Petty, *pro se*, and move for leave to file a brief in support of Petitioners beyond the standard seven-day deadline after Petitioners’ opening brief was filed.

The reason for our tardy filing is that we first learned of this case after the Petitioners’ brief was submitted. It then took us time to turn our research into a letter to the Court in support of their arguments that Respondent Transportation Security Administration’s Federal Transportation Mask Mandate should be vacated because, *inter alia*, the directives were issued without notice and comment as well as in an arbitrary and capricious manner

totally inconsistent with facts known by experts such ourselves in the fields of industrial hygiene plus workplace safety and health.

Once we completed our letter, we then learned that the Court requires *amici* to present a legal brief, not a letter. It took us additional time to research how to prepare a legal brief without an attorney and learn the Court's rules concerning such submissions.

Our brief is filed concurrent with this motion, and we ask the Court to accept it beyond the normal deadline.

We consulted with Lead Petitioner Lucas Wall, who said the Petitioners consent to this motion, and TSA counsel Jennifer Utrecht, who informed us TSA takes no position on this request.

Respectfully submitted this the 6th day of May 2022.



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CERTIFICATE OF COMPLIANCE

We hereby certify that this motion complies with the requirements of FRAP 27(d) because it has been prepared in 14-point Georgia, a proportionally spaced font, and it conforms with the limit of 5,200 words because this document contains 226 words, according to the count of Microsoft Word (excluding sections not counted pursuant to FRAP 32(f)).