

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

HUAIZHAO LIU, et al.,

Plaintiffs,

V.

Civil Action No. 19-cv-03344-KBJ

JINGSHENG WEI

Defendant.

MOTION FOR LEAVE TO E-FILE AS PRO SE

提請允許自訴人網上遞交訴訟文件的動議

COME NOW Plaintiffs Huaizhao Liu and Charlotte Zhang (“Plaintiffs”) respectfully submit this motion for leave to allow e-filing privileges and state as follows: 茲有原告劉懷昭及夏洛特（以下簡稱“原告”）恭敬呈上此動議，並陳述如下：

1. After Plaintiffs filed supplemental memorandum (DKT # 25) regarding their counsel Ms. Nicole Wilt’s Motion to Withdraw (DKT #20) and Judge granted Ms. Wilt’s withdrawal, Ms. Wilt has broken her promise to timely return the retainer¹. The delay of the return of

¹ On Friday the 13th of November 2020, after Plaintiffs had contacted Ms. Wilt through repeated emails, Ms. Wilt agreed to send the retainer back to Plaintiffs “early next week” (see **EXHIBIT**). However, the only thing Plaintiffs have received from Ms. Wilt in the following week, and up to today, is an email in one sentence in reply to Plaintiff Liu, and it reads, “God Bless you as well Heather”. 2020年11月13日（週五），經原告多次郵件聯繫 Wilt 女士，Wilt 女士終於同意“下周初”將聘金返還給原告（見附件展示的內容）。然而，在接下來的一周內，直到今天，原告只收到 Wilt 女

retainer is making the situation even more difficult for Plaintiffs to obtain a new counsel, adding to other withdrawal prejudice issues as mentioned in Plaintiffs' Memorandum in Response to Counsel's Motion to Withdraw (DKT #22), besides making Plaintiffs unable to timely brief their donors (Donation to Plaintiffs has been stopped since Ms. Wilt's entering appearance). 在原告就律師 Nicole Wilt 女士的請辭動議（法院卷宗 #20）提交了補充備忘錄（法院卷宗 #25）、法官隨即批准了 Wilt 女士的請辭之後，Wilt 女士違背承諾，未能及時退還聘金給原告（詳見注釋一）。拖延退回聘金使原告人更加難以找到新的律師，此外還有原告備忘錄（法院卷宗 #22）中提到的其他請辭遺留問題，也使原告人未能及時向其捐款人作簡報（自 Wilt 女士上任代理律師以來，原告的訴訟籌款暫已停止）。

2. While anxiously waiting for the return of retainer fee, Plaintiffs have been nevertheless diligently making efforts to seek legal assistance during the past two weeks, such as through Victim Legal Network of DC, who quickly responded with giving kind referral and consultation but unable to offer Plaintiffs immediate legal representation due to complicated situations. 原告一邊焦急地等待律師返還聘金，一邊仍在努力尋求法律援助，例如通過“受害者法律網路”，該機構亦迅速作出反應，提供了善意的轉介和諮詢，但鑑於目前複雜的局面，無法立即為原告提供法律代理。
3. Plaintiff Charlotte is dropping out of college due to lack of financial support and she is coming back to DC next month, December 2020, to join Plaintiff Liu and find a way to make a living on her own while

士回覆的一封郵件，郵件內容只有一句話，就是 "God Bless you as well Heather"。

seeking continued education. Good thing is, accordingly, she will be able to make herself available and responsive to Court requirements and schedules. 原告夏洛特因缺乏經濟支持而從大學退學，她將於下個月，即 2020 年 12 月回到華盛頓特區，與原告劉會合，一邊投遞當地入學申請、接續大學教育，一邊自謀生路。好在，相應地，她就能配合法院的要求和排程，親自應訴。

4. Not without frustration and anxiety, Plaintiff Liu made an attempt to register with Court for e-filing as pro se for the time being. The registration was rejected with notification that "pro se parties are not permitted to e-file without leave of court." 不無沮喪和焦慮的情況下，原告試圖暫以自訴身份在法院網站登記電子訴訟。登記被拒，得知 "未經法院許可，自訴方不得以電子方式提交訴訟"。

WHEREFORE, for the above-mentioned reasons and concerns, Plaintiffs duly file this motion for leave to grant them e-file privileges as pro se. 鑑於上述原因和關切點，原告正式提出本動議，請求允許其作為自訴人享有電子提交訴訟文件的優待。

Respectfully submitted,

Dated this 20th day of November, 2020.

Plaintiffs

Huaizhao Liu

6218 Georgia Ave. NW #5018

Washington, DC 20011

heather01.liu@gmail.com

(202)660-3235

_____/s/____

Charlotte Zhang

6218 Georgia Ave. NW #5018

Washington, DC 20011

charlottec322556@gmail.com

(202)660-3235

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 2020, I filed the Motion for Leave to E-file at this Honorable Court's drop box, and caused a true copy of the forgoing document to be served by email on the same day to:

Nicole Wilt

1629 K Street NW Suite 300

Washington, DC 20006

202-508-3648

nicolewilt@dclawyerfirm.com

Terminated Counsel still holding Plaintiffs' retainer

David Barger

Greenberg Traurig LLP

1750 Tyson Blvd.

Suite 1200

McLean, VA 22102

703-749-1300

bargerd@gtlaw.com

Counsel for Defendant

Huaizhao Liu

6218 Georgia Ave. NW

#5018

Washington, DC 20011

heather01.liu@gmail.com

(202)660-3235

Plaintiff