

**IN THE
SUPREME COURT OF VIRGINIA**

Record No. 241025

COURT OF APPEALS RECORD NO. 1860-23-3

LLOYD RICE and CHRISTINE ANDRADE,
Petitioners,

– v. –

WOODROCK RIVER WALK LLC,
Respondent.

**MOTION OF *AMICI* ON BEHALF BLUE RIDGE LEGAL
SERVICES, CENTRAL VIRGINIA LEGAL AID SOCIETY, LEGAL AID
JUSTICE CENTER, LEGAL AID SOCIETY OF EASTERN VIRGINIA,
LEGAL AID WORKS, LEGAL SERVICES OF NORTHERN VIRGINIA,
SOUTHWEST VIRGINIA LEGAL AID SOCIETY, VIRGINIA LEGAL AID
SOCIETY, AND THE NATIONAL HOUSING LAW PROJECT,
REQUESTING LEAVE OF COURT TO FILE A BRIEF *AMICUS
CURIAE* IN SUPPORT OF PETITIONERS**

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Counsel for Amici

**AMICI MOTION REQUESTING LEAVE OF COURT TO FILE A BRIEF
AMICUS CURIAE IN SUPPORT OF PETITIONERS**

HERE COME Blue Ridge Legal Services, Central Virginia Legal Aid Society, Legal Aid Justice Center, Legal Aid Society of Eastern Virginia, Legal Services of Northern Virginia, Legal Aid Works, Southwest Virginia Legal Aid Society, Virginia Legal Aid Society, and the National Housing Law Project, through counsel, and pursuant to Rule 5:30(c) of the Rules of the Supreme Court of Virginia move this Honorable Court for leave to file the attached brief *amicus curiae* and in support state as follows:

1. Amici seek leave of court to file a brief *amicus curiae* in support of the Petitioners, Lloyd Rice and Christine Andrade.
2. The National Housing Law Project (“NHLP”) is a national advocacy and litigation group that advocates for tenants’ rights. NHLP’s mission is to advance housing justice for poor people and communities by strengthening and enforcing the rights of tenants and low-income homeowners, increasing housing opportunities for underserved communities, and preserving and expanding the nation’s supply of safe and affordable homes.
3. The other Amici are comprised of organizations that form the legal aid community throughout the Commonwealth of Virginia (“Legal Aid Amici”). These entities are all committed to improving access to justice within the judicial system. Legal Aid Amici provide free legal representation to low-

income Virginians on a wide range of civil matters, including regularly handling tenant representation and eviction defense in unlawful detainer actions before Virginia's courts.

4. All Amici have an interest in ensuring the proper application of the 30-day notice provision of the CARES Act, the federal statutory provision at issue in this case, to unlawful detainer actions brought in Virginia.
5. Given Amici's collective knowledge, and decades of experience, Amici submit that the attached brief *amicus curiae* offers unique and useful information that will aid the Court in assessing whether to grant Petitioners' Petition for Appeal.
6. The undersigned counsel certifies that Amici have sought to obtain the consent of the parties to the filing of their brief *amicus curiae* through their counsel of record.
7. Amici have obtained the consent of Petitioners. Respondent's counsel has not replied to two separate electronic communications from Amici counsel seeking consent, one on December 4, 2024 directed to attorney@senexlaw.com and another on December 5, 2024 directed to patrickpettitt@senexlaw.com.
8. Amici's proposed brief *amicus curiae* is attached.

WHEREFORE Amici, through counsel, respectfully request that this Honorable Court grant their leave to file the attached brief *amicus curiae* in this matter.

RESPECTFULLY SUBMITTED,

/s/ Colleen OConor

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CERTIFICATES

As Counsel for Amici, duly qualified to practice in the Supreme Court of Virginia, we hereby certify that in compliance with the Rules of the Supreme Court of Virginia:

1. A copy of Amici's Motion Requesting Leave of Court to File an Amici Curiae Brief and the tendered Amici Brief will be electronically filed with the Clerk of the Supreme Court of Virginia, P.O. Box 1315, 100 North Ninth Street Richmond, VA 23219-1315, on this 9th day of December 2024.
2. Counsel has sought to obtain consent of all parties. It has obtained the consent of Petitioners through counsel. Respondent's counsel has not replied to two separate electronic communications from Amici counsel seeking consent.
3. Amici's Motion Requesting Leave of Court to File a Brief *Amicus Curiae* and the tendered brief *amicus curiae* are being filed no later than 7 days after the filing of the Petition for Appeal by Petitioners.
4. A copy of Amici's Motion Requesting Leave of Court to File a Brief *Amicus Curiae* and the tendered brief *amicus curiae* will be electronically served upon counsel for all parties as follows:

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