UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

ADA MERCEDES CONDE VIDAL and IVONNE ÁLVAREZ VÉLEZ; MARITZA LÓPEZ AVILÉS and IRIS DELIA RIVERA RIVERA; JOSÉ A. TORRUELLAS IGLESIAS and THOMAS J. ROBINSON; ZULMA OLIVERAS VEGA and YOLANDA ARROYO PIZARRO; JOHANNE VÉLEZ GARCÍA and FAVIOLA MELÉNDEZ RODRÍGUEZ; and PUERTO RICO PARA TOD@S,

Plaintiffs,

v.

ALEJANDRO J. GARCÍA PADILLA, in his official capacity as Governor of the Commonwealth of Puerto Rico; ANA RÍUS ARMENDÁRIZ, in her official capacity as Secretary of the Health Department of the Commonwealth of Puerto Rico; WANDA LLOVET DÍAZ, in her official capacity as Director of the Commonwealth of Puerto Rico Registrar of Vital Records; and JUAN C. ZARAGOSA GÓMEZ, in his official capacity as Director of the Treasury in Puerto Rico,

Defendants.

Civil Action No. 3:14-cv-01253-PG

JOINT MOTION FOR ENTRY OF JUDGMENT

In light of the decision by the United States Supreme Court in Obergefell v. Hodges, 576

U.S. ____, 2015 U.S. LEXIS 4250 (2015), and the judgment of the United States Court of

Appeals for the First Circuit in this matter stating that Puerto Rico's Marriage Ban "is

unconstitutional," Dkt. 62, Plaintiffs Ada M. Conde Vidal and Ivonne Álvarez Vélez, by and

through their attorney; Plaintiffs Maritza López Avilés and Iris Delia Rivera Rivera, José A.

Torruellas Iglesias and Thomas J. Robinson, Zulma Oliveras Vega and Yolanda Arroyo Pizarro,

Johanne Vélez García and Faviola Meléndez Rodríguez, and the organization Puerto Rico Para Tod@s, by and through their attorneys (collectively "Plaintiffs"); and Defendants Alejandro García Padilla, in his official capacity as Governor of the Commonwealth of Puerto Rico; Ana Ríus Armendáriz, in her official capacity as Secretary of the Health Department of the Commonwealth of Puerto Rico; Wanda Llovet Díaz, in her official capacity as Director of the Commonwealth of Puerto Rico Registrar of Vital Records; and Juan C. Zaragosa Gómez, in his official capacity as Director of the Treasury in Puerto Rico, by and through their attorneys, respectfully move this Court to enter the enclosed proposed judgment in favor of Plaintiffs.

WHEREFORE, in light of *Obergefell v. Hodges* and the judgment of the Court of Appeals for the First Circuit, the parties hereby jointly move this Court to enter the enclosed proposed judgment in favor of Plaintiffs.

Dated: July 16, 2015

/s/ Wandymar Burgos Vargas

Wandymar Burgos Vargas (USDC 223502) Idza Díaz Rivera (USDC 223404) Federal Litigation Division **DEPARTMENT OF JUSTICE COMMONWEALTH OF PUERTO RICO** P.O. Box 9020192 San Juan, PR 00902-0192 <u>wburgos@justicia.pr.gov</u> <u>idiaz@justicia.pr.gov</u>

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/s/ Ada M. Conde-Vidal Ada M. Conde-Vidal (USDC 206209) CONDE ATTORNEY AT LAW, PSC P.O. Box 13268 San Juan, PR 00908-3268 (787) 721-0401 condelawpr@gmail.com

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Respectfully submitted,

/s/ Omar Gonzalez-Pagan

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CERTIFICATE OF SERVICE

I, Omar Gonzalez-Pagan, an attorney, certify that on July 16, 2015, I served upon counsel for all parties by electronically filing the foregoing with the Clerk of the Court using the CM/ECF system.

> <u>/s/ Omar Gonzalez-Pagan</u> Omar Gonzalez-Pagan* **LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC.** 120 Wall Street, 19th Floor New York, New York 10005-3904 T: (212) 809-8585 | F: (212) 809-0055 ogonzalez-pagan@lambdalegal.org