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April 15, 2022

Via UPS

The Honorable Louis R. Lerner  
2919 Chesapeake Avenue  
Hampton, VA 23661

**Re: Sadler Brothers Oil Company v. Commonwealth of Virginia, et al.  
Case No. CL21000207-00**

Dear Judge Lerner:

I hope that this letter finds you well and in good spirits.

Enclosed with this letter is a Consent Motion to Continue the *Sadler v. Va., et. al.* matter, as well as a consent Order that extends the Preliminary Injunction to the new trial date, if that is agreeable to the Court.

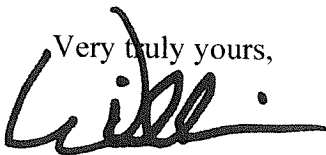
I have conferred with counsel for the defendants, who are copied on this letter, and they agree that an extension of the injunction and continuance of the hearing date are the best course of action in light of recent events in the General Assembly. The General Assembly took no action on skill games during the most recent legislative session, and there will be an extended special session to work out a new two-year budget bill, which may impact skill games. It is likely that the budget issues and any new legislation governing skill games will not be resolved until well after our current May 18<sup>th</sup> final hearing, and all parties agree that it would be best to continue the final hearing until after this special session concludes. Moreover, the special session may interfere with my availability to prepare for and appear at the final hearing as currently scheduled, which could require me to have no other choice but to invoke Virginia Code Section 30-5.

The parties firmly believe that an extension of the temporary injunction and continuance of the final hearing until the late summer or early fall is in the best interests of all parties and judicial economy. If the Consent Motion and Order are acceptable to Your Honor, counsel for Defendants and I will call the Greenville Clerk and secure an available and mutually agreeable date in the late summer or early fall for the final hearing.

Thank you for your kind consideration in this matter.

Until then, I remain;

Very truly yours,

A handwritten signature in black ink, appearing to read "WMS", with a long horizontal flourish extending to the right.

William M. Stanley

WMS/dadd

Enclosures

cc: Sadler Brother's (w/encl.)

Erin R. McNeil, Esq. (w/encl.)

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF GREENSVILLE

SADLER BROTHERS OIL COMPANY, )  
d/b/a SADLER TRAVEL PLAZA, )  
SLIP-IN FOOD MART, INC. and )  
CHN, LLC )  
Plaintiffs, )

v. )

Case No. 21-207

THE COMMONWEALTH OF VIRGINIA, )  
RALPH NORTHAM, in his official capacity )  
as Governor of the Commonwealth of )  
Virginia, MARK HERRING, in his official )  
capacity as Attorney General for the )  
Commonwealth of Virginia, and )  
THE VIRGINIA ALCOHOLIC )  
BEVERAGE CONTROL AUTHORITY, )  
Defendants. )

**CONSENT ORDER MODIFYING TEMPORARY INJUNCTION**

THIS CAUSE having been presented by stipulation of the parties, it is hereby ORDERED that:

1. The Temporary Injunction dated December 6, 2021 (“the Temporary Injunction”) shall be extended until \_\_\_\_\_, 2022, on which date it shall expire. The
2. The final hearing and determination of the merits on this matter shall be conducted in Greensville Circuit Court on \_\_\_\_\_, 2022.
3. Defendants the Commonwealth of Virginia, Governor Glenn Youngkin, Attorney General Jason Miyares, and the Virginia Alcoholic Beverage Control Authority are temporarily enjoined from enforcing the ban on skill games encompassed in Chapters 1217 and 1277 of the

2020 Acts of Assembly (a/k/a SB 971 or HB 881) with respect to those games that were taxed and regulated as “skill games” by the Virginia Alcoholic Beverage Control Authority prior to July 1, 2021.

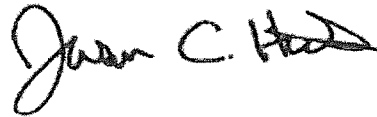
IT IS SO ORDERED, AND THIS MATTER IS CONTINUED.

ENTERED this \_\_\_\_ day of \_\_\_\_\_, 2022.

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Greensville Circuit Court Judge

WE ASK FOR THIS:



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Jason C. Hicks (VSB No. 46961)  
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201 E. Main Street, Suite P  
Charlottesville, VA 22902  
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Email: rodsmolla@gmail.com  
*Counsel for Plaintiffs*

SEEN AND AGREED TO (without waiving  
objections on original 12/6/22 Order):

*Erin McNeill*

---

Erin R. McNeill (VA State Bar # 78816)

Calvin C. Brown (VA State Bar # 93192)

Office of the Attorney General

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Richmond, Va. 23219

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April 15, 2022

The Hon. Linda B. Edwards  
Circuit Court for the County of Greensville  
337 South Main Street  
Emporia, VA 23847

Re: Sadler Brothers Oil Company v. Commonwealth of Virginia, et al.  
Case No. CL21000207-00

Dear Ms. Edwards:

Enclosed please find a copy of the letter and Consent Order Modifying Temporary Injunction along with the Consent Motion for Continuance of Trial Date and Modification of the Temporary Injunction we sent to The Honorable Louis R. Lerner for endorsement and filing with the Court. Please forward counsel of record a copy once it has been entered by Judge Lerner and filed.

Thank you for your consideration in this matter.

Until then, I remain;

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Stanley', written over a horizontal line.

William M. Stanley, Esq.

WMS/dadd  
cc: Hermie Sadler  
The Honorable Louis R. Lerner  
Erica Mosley, Judge Lerner's Clerk  
Calvin C. Brown,  
Assistant Attorney General

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF GREENSVILLE

SADLER BROTHERS OIL COMPANY, )  
d/b/a SADLER TRAVEL PLAZA, )  
SLIP-IN FOOD MART, INC. and )  
CHN, LLC )

Plaintiffs, )

v. )

Case No. 21-207

THE COMMONWEALTH OF VIRGINIA, )  
RALPH NORTHAM, in his official capacity )  
as Governor of the Commonwealth of )  
Virginia, MARK HERRING, in his official )  
capacity as Attorney General for the )  
Commonwealth of Virginia, and )  
THE VIRGINIA ALCOHOLIC )  
BEVERAGE CONTROL AUTHORITY, )

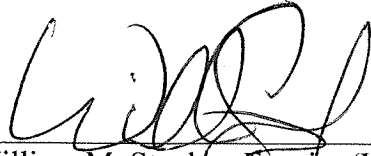
Defendants. )

**CONSENT MOTION FOR CONTINUANCE OF TRIAL DATE AND AND  
MODIFICATION OF THE TEMPORARY INJUNCTION**

COMES NOW, the Plaintiffs, by counsel and with the consent and agreement of the Defendants, move this Honorable Court to continue the scheduled May 18, 2022 permanent injunction hearing, and continue the Temporary Injunction Order previously entered in this matter to the new trial date to be set by the Court in the above-styled matter.

WHEREFORE, your Parties respectfully pray that the Plaintiffs' Motion for Continuance of Trial Date and Extension and Modification of the Temporary Injunction be granted.

Respectfully Submitted,  
Sadler Brothers Oil Co., et. al.  
Plaintiffs



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and

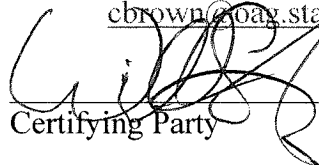
Jason C. Hicks (VSB No. 46961)  
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*Counsel for Plaintiff Slip-In Food Marts, Inc.*  
and

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Email: [rodsmolla@gmail.com](mailto:rodsmolla@gmail.com)  
*Counsel for Plaintiffs*

#### Certificate of Service

A true copy of the foregoing motion and proposed order were sent, electronically and by first-class mail, this 15<sup>th</sup> day of April, 2022 to:

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Calvin C. Brown (VA State Bar # 93192)  
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202 North Ninth Street  
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Email: [emcneill@oag.state.va.us](mailto:emcneill@oag.state.va.us)  
[cbrown@oag.state.va.us](mailto:cbrown@oag.state.va.us)

  
\_\_\_\_\_  
Certifying Party