

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

AMBER COLVILLE, et al.

Plaintiffs,

v.

XAVIER BECERRA, et al.,

Defendants.

No. 1:22-cv-113-TBM-RPM

**CONSENT MOTION FOR AN EXTENSION OF TIME TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS
OR TO AMEND THE COMPLAINT**

Defendants filed a motion to dismiss on Monday. *See* Doc. 15. Plaintiffs have 14 days to either oppose the motion, Local Rule 7(b)(4), or to amend their complaint as of right, *cf.* Fed. R. Civ. P. 15(a)(1)(B). Plaintiffs respectfully ask for those deadlines to be extended 30 days, moving their deadline to oppose or amend from July 25, 2022, to August 24, 2022. Plaintiffs have good cause for an extension because their attorneys have several preexisting, competing obligations. Not counting the eight attorneys' general who represent the plaintiff States—who have myriad responsibilities of their own—Plaintiffs' private counsel have competing obligations that include

- a preliminary-injunction hearing for the Republican Party in *In re: Georgia Senate Bill 202*, 1:21-mi-55555 (N.D. Ga.);
- emergency post-decision proceedings for President Trump and his businesses in *Trump v. Mazars USA, LLP*, Nos. 21-5176, 21-5177 (D.C. Cir.);
- discovery for the Republican Party in seven related cases in *Georgia Senate Bill 202* and *VoteAmerica v. Raffensperger*, No. 1:21-cv-1390 (N.D. Ga.);

- discovery for the Republican Party in *DCCC v. Kosinski*, No. 1:22-cv-1029 (S.D.N.Y.); and
- discovery for the plaintiff in *Hening v. Adair*, No. 7:21-cv-131 (W.D. Va.).

Plaintiffs conferred with Defendants, who consent to this extension. Defendants requested that, as part of the same order, this Court also extend their reply deadline to September 9, 2022. Plaintiffs consent to that extension.

For all these reasons, Plaintiffs respectfully ask the Court to move Plaintiffs' deadline to respond to the motion to dismiss or amend their complaint to August 24, 2022, and to move Defendants' deadline to file a reply in support of their motion to dismiss to September 9, 2022.

Dated: July 15, 2022

Respectfully submitted,

s/ Jennifer Moran Young

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CERTIFICATE OF SERVICE

I e-filed this motion with the Court, which will email everyone requiring service.

Dated: July 15, 2022

s/ Cameron T. Norris