IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORTH WORTH DIVISION

DATA MARKETING PARTNERSHIP, LP, et al.,)))
Plaintiffs,)) Civil Action No. 4:19-cv-00800-O
v.)
UNITED STATES DEPARTMENT OF))
LABOR, et al.,	
Defendants.)
	_)

JOINT MOTION FOR EXTENSION OF TIME TO FILE STATUS REPORT

The parties respectfully request that the Court grant a two-week extension, through September 15, 2023, for the parties to file their joint status report indicating their proposals for how this case should proceed. There is good cause to grant this extension:

- 1. The Court's August 11, 2023 Opinion and Order Denying Defendants' Motion to Remand [ECF No. 51] set a September 1, 2023 deadline for the parties' joint status report.
- 2. A fourteen- day extension would assist the parties in conferring and narrowing any disputes. Several relevant personnel at the U.S. Department of Justice and U.S. Department of Labor are on overlapping periods of personal leave. The parties will be best positioned to discuss proposals for how this case should proceed in early September, once relevant personnel have returned from leave.
- 3. No other deadlines have been scheduled in this case, and this extension will not prejudice any party.

Dated: August 21, 2023

/s/ Jonathan D. Crumley (by permission)

Jonathan D. Crumly, Sr.

Pro Hac Vice

Freeman Mathis & Gary, LLP

100 Galleria Parkway, Suite 1600

Atlanta, GA 30339 Tel: 770.8180000 Fax: 770.937.9960

Email: Jonathan.Crumly@fmglaw.com

Robert G. Chadwick, Jr.

Texas Bar No. 04056075

Freeman Mathis & Gary, LLP

7160 Dallas Parkway, Suite 625

Plano, Texas 75024 Tel: 469.895.3003 Fax: 888.356.3602

Email: bob.chadwick@fmglaw.com

Michael L Jones

Texas Bar No. 10929460

Law Office of Michael Jones

16901 Dallas Parkway, Suite 202

Addison, TX 75001 Tel: 214-954-9700

Email: mjones@henryandjones.com

Attorneys For Plaintiffs

Respectfully submitted,

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General

BRAD P. ROSENBERG

Assistant Director

Civil Division, Federal Programs Branch

/s/ Galen N. Thorp

GALEN N. THORP (VA Bar # 75517)

Senior Trial Counsel

United States Department of Justice

Civil Division, Federal Programs Branch

1100 L Street NW

Washington, D.C. 20530

Tel: (202) 514-4781 / Fax: (202) 616-8460

galen.thorp@usdoj.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

On August 21, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served the parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Galen N. Thorp
GALEN N. THORP