

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

DATA MARKETING PARTNERSHIP, LP,
et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
LABOR, et al.,

Defendants.

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) Civil Action No. 4:19-cv-00800-O
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**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR
LEAVE TO FILE AND SERVE SUPPLEMENTAL COMPLAINT**

Defendants respectfully request that the Court grant a two-week extension, through December 6, 2024, for the Defendants to file their opposition to Plaintiffs' Motion for Leave to File and Serve Supplemental Complaint. There is good cause to grant this extension:

1. On November 1, 2024, Plaintiffs filed a Motion for Leave to File and Serve Supplemental Complaint, attaching a proposed 31-page supplemental complaint raising four new counts against the Defendants, along with more than 250 pages of exhibits.

2. Pursuant to Local Rule 7.1(e), Defendants' opposition to Plaintiffs' motion is currently due on November 22, 2024. Undersigned counsel needs additional time to complete Defendants' opposition brief due to the press of other matters, including an unexpected court order today requiring a brief to be filed tomorrow, and a division-wide computer network outage that lasted more than 60 hours earlier this week. Additionally, undersigned counsel is scheduled to be out of the office on leave most of next week due to the Thanksgiving holiday. Accordingly, an

extension of two weeks, through December 6, 2024, would provide sufficient time to complete Defendants' opposition brief.

3. This extension will not prejudice any party. Undersigned counsel conferred with Plaintiffs' counsel who stated that Plaintiffs consent to this motion and request that their reply brief be set for December 31, 2024, 25 days after Defendants' opposition brief.

Dated: November 20, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JULIE STRAUS HARRIS
Assistant Director
Civil Division, Federal Programs Branch

/s/ Galen N. Thorp
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Counsel for Defendants

CERTIFICATE OF SERVICE

On November 20, 2024, 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