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.)
	_)

CONSENT MOTION FOR THIRD EXTENSION OF TIME FOR SUMMARY JUDGMENT BRIEFING

Defendants respectfully request that the Court grant a three week extension, through May 31, 2024, for the Defendants to file their opposition to Plaintiffs' Motion for Summary Judgment. There is good cause to grant this extension:

- 1. The Court's March 27, 2024 Order [ECF No. 61] granted a second extension through May 10, 2024 for Defendants' opposition to Plaintiffs' Motion for Summary Judgment.
- 2. The parties are currently engaged in productive discussion regarding whether a nonjudicial resolution of this matter is possible. Since March 27, the parties have held a conference call and exchanged two letters. Given the complexities of the case and the number of stakeholders, the parties need more time for negotiations to progress. This third extension would allow the parties to either complete their negotiation or conclude that summary judgment briefing is still necessary.

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 June 21, 2024, three weeks after Defendants' opposition brief.

Dated: April 29, 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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CERTIFICATE OF SERVICE

On April 29, 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

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