

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Stephen M. Shapiro, et al.

Plaintiffs,

vs.

David J. McManus, Jr., et al.,

Defendants.

Case No. 13-cv-3233

Three-Judge Court

JOINT MOTION TO EXTEND BRIEFING DEADLINES

Pursuant to Federal Rules of Civil Procedure 6(b)(1) and 7(b)(1) and Local Rule 105.9, the parties jointly move the Court to enter an order setting filing deadlines of **May 20, 2016** for plaintiffs' opposition to the motion to dismiss and of **June 14, 2016** for defendants' reply in support of the motion to dismiss.

In support thereof, the parties state as follows:

1. Plaintiffs filed their motion for leave to file the Second Amended Complaint on February 16, 2016. The Court granted the motion on March 3, 2016, and the Second Amended Complaint was deemed filed that day.
2. In the same order granting leave to file the Second Amended Complaint, the Court *sua sponte* set a filing deadline for the State's motion to dismiss of April 15, 2016.
3. On March 24, 2016, the State sought, and the following day the Court granted, a 5-day extension of time for the motion to dismiss, to April 20, 2016.
4. The State filed a timely motion to dismiss on April 20, 2016.
5. The Court held a scheduling conference on April 22, 2016 and thereafter set a hearing date of July 12, 2016 for the motion to dismiss.

6. Without extension, plaintiffs' opposition to the motion to dismiss will be due May 9, 2016. If the opposition is filed on that date, the State's reply in support of the motion will be due May 26, 2016.

7. The requested extensions will ensure that the parties have sufficient time to thoroughly research and thoughtfully brief the issues presented in the motion to dismiss, while also providing the Court with four weeks to review the briefs in advance of the July 12, 2016 hearing.

WHEREFORE the parties respectfully request that the Court enter an order setting filing deadlines of May 20, 2016 for plaintiffs' opposition to the motion to dismiss and of June 14, 2016 for defendants' reply in support of the motion to dismiss.

Respectfully submitted,

Brian E. Frosh
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/s/ Jennifer L. Katz

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(signed by Michael B. Kimberly
with permission of Jennifer L. Katz)

Dated: April 26, 2016

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