

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:14-cv-00369-BO

FELICITY M. TODD VEASEY and)
SECOND AMENDMENT FOUNDATION,)
INC.,)
)
Plaintiffs,)
)
v.)
)
BRINDELL B. WILKINS, JR., in his official)
Capacity as Sheriff of Granville County, North)
Carolina, PAT McCrORY, in his Official)
Capacity as Governor of North Carolina,)
ROY COOPER, in his Official Capacity as)
Attorney General of North Carolina, and)
FRANK L. PERRY, in his Official Capacity as)
Secretary of the North Carolina Department of)
Public Safety,)
)
Defendants.)

**PLAINTIFFS' MOTION FOR
EXTENSION OF TIME**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiffs, by their attorneys, respectfully move this Court for an enlargement of time to respond to Defendants Pat McCrory, Roy Cooper and Frank L. Perry's Motion to Dismiss. In support of its motion, Plaintiffs show unto the Court the following:

1. On April 2, 2015, Defendants Pat McCrory, Roy Cooper and Frank L. Perry filed their Motion to Dismiss [D.E. 43].
2. The time for serving responses and defensive pleadings has not expired and a response is currently due from Plaintiffs on or about April 27, 2015.
3. Additional days are needed to prepare responses and defensive pleadings.
4. Counsel for the Plaintiffs has consulted with counsel for Defendants who does not object to the extension requested herein.

5. This Motion is made in good faith and not for purposes of undue delay.

WHEREFORE, Plaintiff respectfully requests the Court for an Order permitting it an additional eleven (11) days within which to file a brief responding to Defendant's Motion to Dismiss to and including May 8, 2015. A proposed Order is attached.

Respectfully submitted this the 27th day of April, 2015.

WILLIAMS MULLEN

BY: /s/ Camden R. Webb

Camden R. Webb

N.C. State Bar No. 22374

crwebb@williamsmullen.com

P. O. Box 1000

Raleigh, North Carolina 27602

Telephone: (919) 981-4000

Facsimile: (919) 981-4300

Local Civil Rule 83.1 Counsel for Plaintiffs

LAW FIRM OF DAVID G. SIGALE, P.C.

BY: /s/ David G. Sigale

IL Bar No. 6238103

dsigale@sigalelaw.com

799 Roosevelt Road, Suite 207

Glen Ellyn, IL 60137

Telephone: (630) 452-4547

Facsimile: (630) 596-4445

Counsel for Plaintiffs

Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

James C. Wrenn, Jr. – jcw@hopperhickswrenn.com

Andrew H. Erteschik – aerteschik@poynerspruill.com

David G. Sigale – dsigale@sigalelaw.com

Hal F. Askins – haskins@ncdoj.gov

J. Joy Strickland – jstrickland@ncdoj.gov

WILLIAMS MULLEN

BY: /s/ Camden R. Webb
Camden R. Webb
N.C. State Bar No. 22374
crwebb@williamsmullen.com
P. O. Box 1000
Raleigh, North Carolina 27602
Telephone: (919) 981-4000
Facsimile: (919) 981-4300
Local Civil Rule 83.1 Counsel for Plaintiffs

LAW FIRM OF DAVID G. SIGALE, P.C.

BY: /s/ David G. Sigale
IL Bar No. 6238103
dsigale@sigalelaw.com
799 Roosevelt Road, Suite 207
Glen Ellyn, IL 60137
Telephone: (630) 452-4547
Facsimile: (630) 596-4445
Counsel for Plaintiffs
Admitted Pro Hac Vice