

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:10-CV-00265-H

MICHAEL BATEMAN, VIRGIL GREEN,)
FORREST MINGES, JR., GRNC/FFE, INC.,)
and SECOND AMENDMENT FOUNDATION,)
INC.,)
)
Plaintiffs,)
)
v.)
)
BEVERLY PERDUE, REUBEN F. YOUNG,)
STOKES COUNTY, and CITY OF KING,)
)
Defendants.)

**MOTION FOR
EXTENSION OF TIME**

NOW COMES the undersigned counsel, on behalf of Defendants Beverly Perdue and Reuben F. Young (hereafter collectively “the State Defendants”), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and moves the Court for a thirty-day extension of time, up to and including the 25th day of July, 2012, in which to respond to Plaintiff’s Motion for Attorneys’ Fees and Costs. In support of this motion, the State Defendants show unto the Court the following:

- (1) Plaintiffs filed a Motion for Attorneys’ Fees and Costs on 11 June 2012. The time for filing the State Defendants’ response has not yet expired;
- (2) Counsel for the State Defendants is currently involved in discovery in the State’s redistricting matters, *Dickson v. Rucho*, No. 11 CVS 16896; *NC NAACP v. State of North Carolina*, No. 11 CVS 16940 (Consolidated), including the taking and/or defending of 8 depositions over the last three weeks, and needs additional time to prepare a response;
- (3) Counsel for Plaintiffs has stated that he consents to this motion.

WHEREFORE, the State Defendants move the Court for a thirty-day extension of time, up to and including the 25th day of July, 2012, in which to respond to Plaintiffs' Motion for Attorneys' Fees and Costs.

Respectfully submitted this the 25th day of June. 2012.

ROY COOPER
Attorney General

/s/ Alexander McC. Peters
Alexander McC. Peters
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Wes J. Camden
Kearns Davis
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and via U.S. mail, first-class postage paid thereon, addressed to:

Alan Gura
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101 N. Columbus Street, Suite 405
Alexandria, VA 22314

This the 25th day of June, 2011.

/s/ Alexander McC. Peters
Alexander McC. Peters
Special Deputy Attorney General