

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
No. 5:14-cv-369

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)

MOTION TO EXTEND TIME TO
RESPOND OR OTHERWISE PLEAD

NOW COME Defendants Pat McCrory, Governor of the State of North Carolina, Roy Cooper, Attorney General of North Carolina, and Frank L. Perry, Secretary of the North Carolina Department of Public Safety each in their official capacities, by and through Special Deputy Attorney General Hal F. Askins, and Assistant Attorney General J. Joy Strickland and move this Court for an extension of time to respond or otherwise plead to Plaintiffs' Amended Complaint for Declaratory and Injunctive Relief pursuant to Rules 6(b)(1)(A) of the Federal Rules of Civil Procedure. Defendants' Motion For Extension of Time to Respond or Otherwise Plead should be granted on the following grounds:

1. That on February 11, 2015, Plaintiffs filed an Amended Complaint for Declaratory and Injunctive Relief in the above-captioned matter.

2. That on February 20, 2015, Defendant Pat McCrory received a copy of Plaintiffs' Amended Complaint. That on February 20, 2015, Defendant Roy Cooper received a copy of Plaintiffs' Amended Complaint. That on February 20, 2015, Defendant Frank Perry received a copy of the Plaintiffs' Amended Complaint.

3. That the undersigned was assigned to represent Defendants McCrory, Cooper, and Perry in this matter.

4. That the time to respond or otherwise plead has not yet expired.

5. That the undersigned requires an additional 20 days to review all previously filed documents in this matter and form an appropriate response on behalf of the Defendants.

6. That the undersigned had contacted counsel for Plaintiffs Felicity M. Todd Veasey and Second Amendment Foundation, Inc. and counsel for Defendant Sheriff Brindell B. Wilkins, Jr. and they do not oppose this request for extension of time.

WHEREFORE, Defendants move the Court for an extension of time to respond or otherwise plead, pursuant to Rules 6(b)(1)(A) of the Federal Rules of Civil Procedure.

Respectfully submitted, this the 10th day of March, 2015.

Roy Cooper
ATTORNEY GENERAL

/s/Hal F. Askins
Hal F. Askins

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing MOTION TO DISMISS with the Clerk of Court using the CM/ECF system, and served a copy on the following by depositing same in the United States mail, postage prepared, addressed to:

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This the 10th day of March, 2015.

/s/ Hal F. Askins
Hal F. Askins
Special Deputy Attorney General