## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

PULLMAN ARMS INC.; GUNS and GEAR, LLC; PAPER CITY FIREARMS, LLC; GRRR! GEAR, INC.; and NATIONAL SHOOTING SPORTS FOUNDATION, INC.,

Plaintiffs,

v.

CIVIL ACTION NO. 4:16-cv-40136-TJH

MAURA HEALEY, ATTORNEY GENERAL FOR THE COMMONWEALTH OF MASSACHUSETTS,

Defendant.

## MOTION TO ENLARGE TIME TO RESPOND TO AMENDED COMPLAINT

(Assented to)

Pursuant to Fed. R. Civ. P. 6(b), defendant Maura Healey, as Attorney General of Massachusetts, hereby moves to enlarge her time to answer or otherwise move in response to the Amended Complaint by 14 days to, and including, January 10, 2017. The plaintiffs, by their counsel, assent to the allowance of this motion.

As grounds for this motion, the Attorney General states:

- 1. The plaintiffs filed an amended complaint on December 13, 2017. Under Fed. R. Civ. P. 15(a)(3), the Attorney General has 14 days to respond (i.e. to December 27, 2016).
- 2. The Amended Complaint is 24 pages and contains 102 paragraphs. It asserts claims against the Attorney General that seek to challenge the Enforcement Notice her office issued in July 2016 interpreting the Massachusetts Assault Weapons Ban, G.L. c. 140, §§ 121, 131M.

3. Undersigned counsel has pre-existing plans to be out of the office for the holidays

from the afternoon of December 23 to January 3. For that reason, counsel needs additional time

to prepare the Attorney General's response to the Amended Complaint. In addition, other staff

from the Office of the Attorney General, who would normally assist in this effort, are also out of

the office during this holiday period. Given the press of business, and the upcoming holidays,

counsel respectfully requests this additional time.

WHEREFORE, the Attorney General asks that her time to answer or otherwise move in

response to the Amended Complaint be enlarged to, and including, January 10, 2017.

Respectfully submitted,

MAURA HEALEY ATTORNEY GENERAL

/s/ William W. Porter

William W. Porter, BBO #542207

**Assistant Attorney General** 

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Date: December 23, 2016

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## CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

I certify that, on December 22, 2016, I conferred with David Kerrigan, counsel for the plaintiffs, and he assented to the allowance of this motion on behalf of the plaintiffs.

/s/ William W. Porter
William W. Porter
Assistant Attorney General

## **CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 23, 2016.

/s/ William W. Porter
William W. Porter
Assistant Attorney General