

**UNITED STATES COURT OF APPEALS
NINTH CIRCUIT**

GEORGE K. YOUNG JR.,)	
Plaintiff-Appellant,)	
vs.)	No. 12-17808
STATE OF HAWAII, ET AL.,)	
Defendants - Appellees.)	

Appellant’s Opposition to Appellees’ Motion for Extension of Time to File the Parties’ Supplemental *En Banc* Reply Briefs

Comes now the Plaintiff-Appellant George K. Young, Jr. and for his Opposition to Appellees’ Motion for Extension of Time to File the Parties’ Supplemental *En Banc* Reply Briefs (“Motion”), states as follows:

Appellees filed their Motion on June 3, 2020 seeking seven (7) extra days to file an optional reply to a supplemental brief that hasn’t even been filed yet. Appellees claim good cause because of the “complex issues presented” and that “[c]ounsel for Defendants-Appellees has several arguments and briefing deadlines set between now and the time the supplemental reply briefing is due.” Motion at ¶ 4.

This shouldn’t be taken seriously. Their motion has ten attorneys listed on it. The law firm handling this matter has over 2,600 attorneys.¹ Mr. Young has two (2)

¹ <https://www.law.com/law-firm-profile/?id=143&name=Hogan-Lovells>

lawyers. One of the “good cause” reasons is that they had a reply brief due yesterday. This is a day before the supplemental brief is even due and before a purported reply could even be started. That the Defendants-Appellees are state and local government entities doesn’t mean anything. The Attorney General of Hawaii is listed on the Motion and will (presumably) be working on the brief. They have the entire State’s legal team (and the County’s) behind them. So, 2,600 attorneys plus however many the State and County have to potentially work on this reply?

The Defendants-Appellees don’t need extra time. They need to file their brief on time (if they even want to, as it is an optional reply) as set by this Court and this case needs to continue to progress through this Court without any further delay.

Respectfully submitted, this the 4th day of June 2020.

s/ Alan Beck
Alan Beck (HI Bar No. 9145)

s/ Stephen D. Stamboulieh
Stephen D. Stamboulieh

CERTIFICATE OF COMPLIANCE

1. This response complies with the length limitation of Circuit Rule 27-1(d) because it is less than 20 pages, excluding the parts of the document exempted by Circuit Rule 27-1(d).

2. This response complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the typestyle requirements of Federal Rule of Appellate Procedure 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Office 365 in Times New Roman 14-point font.

s/ Stephen D. Stamboulieh
Stephen D. Stamboulieh

CERTIFICATE OF SERVICE

On this, the 4th day of June 2020, I served the foregoing pleading by electronically filing it with the Court's CM/ECF system which generated a Notice of Filing and effects service upon counsel for all parties in the case. I declare under penalty of perjury that the foregoing is true and correct.

Executed this, the 4th day of June 2020.

s/ Stephen D. Stamboulieh