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15 *Attorneys for Plaintiffs*

16 **UNITED STATES DISTRICT COURT**
17 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

18 **LANA RAE RENNA, et al.,**
19 **Plaintiffs,**

20 **vs.**

21 **ROB BONTA, et al.,**
22 **Defendants.**

Case No.: 20-cv-2190-DMS-DEB

**MOTION TO EXTEND
DEADLINE FOR REPLY
TO DEFENDANTS'
OPPOSITION TO MOTION
FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Date: October 7, 2022

Time: 1:30 p.m.

Department: 13A

Hon.: Dana M. Sabraw

1 Plaintiffs' reply to Defendants' opposition to the motion for temporary
2 restraining order and preliminary injunction is currently due Friday, September 30,
3 2022, and the hearing is currently set for October 7, 2022. As lead counsel, I have
4 been diligently working on the reply brief and fully intended to have the brief timely
5 filed by the current deadline. However, there has been death of a close relative in my
6 family. The funeral services are tomorrow morning, out of state. I need to be there.
7 Consequently, I have had to spend most of today traveling, and I will be preoccupied
8 most of the day on Friday and Saturday with the services and family gatherings. With
9 all the work done on the brief to date, it is substantially complete. However, this
10 process always also involves consultation with the clients, who must review the brief
11 and raise any questions or comments they may have, which counsel must have
12 adequate opportunity to address before finalizing the brief. Given my limited
13 availability today, tomorrow, and over the weekend, this process cannot realistically
14 be completed by the current deadline, as I will not be returning until late Sunday.

15 For these reasons, I respectfully request on behalf of Plaintiffs that the
16 deadline to file the reply brief be extended to Tuesday, October 4, 2022, with the
17 hearing to remain on calendar for October 7, 2022. If at all possible, we will file the
18 brief sooner, on Monday, the 3rd. I have discussed this situation with counsel for
19 Defendants, and she has stated that Defendants do not oppose this request.

20 Dated: September 29, 2022

Respectfully submitted,

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/s/Raymond M. DiGuiseppe
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