

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:16-cv-00425

UNITED STATES OF AMERICA,)
)
Plaintiff,)
v.)
)
STATE OF NORTH CAROLINA;)
PATRICK MCCRORY, in his official)
capacity as Governor of North Carolina; THE)
NORTH CAROLINA DEPARTMENT OF)
PUBLIC SAFETY; UNIVERSITY OF)
NORTH CAROLINA; and BOARD OF)
GOVERNORS OF THE UNIVERSITY OF)
NORTH CAROLINA,)
)
Defendants.)
_____)

**MOTION FOR
EXTENSION OF TIME**

NOW COMES Defendant State of North Carolina, (“State of North Carolina”), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and LR6.1, and hereby moves the Court to extend the time to answer or otherwise respond to the Complaint filed herein by an additional forty-four (44) days.

In support of this motion, the State of North Carolina shows unto the Court that it was served with the Summons and Complaint herein on May 12, 2016; that the State of North Carolina’s time for responding to the Complaint has not expired; and, that the State of North Carolina requires additional time to prepare its responsive pleadings. Furthermore, on May 25, 2016, UNC Defendants have requested an extension of time to the same deadline for all Defendants in the instant case. [DE 15] That motion is currently pending before the Court. Adoption of a uniform deadline for responsive pleadings from all Defendants will facilitate the orderly administration of this case.

The undersigned counsel for the State of North Carolina has consulted with counsel for Plaintiff who has indicated Plaintiff's consent to this motion.

WHEREFORE, the State of North Carolina prays the Court to grant it an extension of time of forty-four (44) additional days to serve its answer or otherwise respond to the Complaint, to and including July 18, 2016.

Respectfully submitted, this the 27th day of May, 2016.

ROY COOPER
Attorney General

/s/ Olga E. Vysotskaya de Brito
Ms. Olga E. Vysotskaya de Brito
Special Deputy Attorney General
North Carolina State Bar No. 31846
North Carolina Dept. of Justice
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Raleigh, NC 27602
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Facsimile: (919) 716-6759
Email: ovysotskaya@ncdoj.gov

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a copy of the foregoing pleading was served on the registered parties through the Court's Electronic Filing notification process. I do hereby further certify that a copy of the foregoing pleading was served on the unregistered parties or their counsel by first class mail addressed as follows:

PATRICK MCCRORY
c/o Robert C. Stephens
General Counsel, Office of the Governor of North Carolina
116 West Jones Street
Raleigh, NC 27603-8001

NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY
c/o Deborah L. McSwain
NCDPS General Counsel
512 N. Salisbury Street
Raleigh, NC 27604

This the 27th day of May, 2016.

ROY COOPER
Attorney General

/s/ Olga E. Vysotskaya de Brito
Ms. Olga E. Vysotskaya de Brito
Special Deputy Attorney General

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Defendants.)
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**ORDER GRANTING
EXTENSION OF TIME**

For good cause shown, Defendant the State of North Carolina is granted a forty four (44) day extension of time to answer or otherwise respond to the Complaint filed herein. The State of North Carolina shall serve its answer or otherwise respond to the Complaint on or before July 18, 2016.

This the ____ day of _____, 2016.

United States District Judge/Magistrate Judge

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NORTH CAROLINA,)
)
Defendants.)
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NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Special Deputy Attorney General Olga E. Vysotskaya de Brito of the North Carolina Attorney General’s Office enters her Notice of Appearance as counsel representing Defendant the State of North Carolina.

Respectfully submitted, this 27th day of May, 2016.

ROY COOPER
Attorney General

/s/ Olga E. Vysotskaya de Brito
Ms. Olga E. Vysotskaya de Brito
Special Deputy Attorney General
North Carolina State Bar No. 31846
North Carolina Dept. of Justice
Post Office Box 629
Raleigh, NC 27602
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I, the undersigned attorney, do hereby certify that a copy of the foregoing pleading was served on the registered parties through the Court's Electronic Filing notification process. I, the undersigned attorney, do hereby further certify that a copy of the foregoing pleading was served on the unregistered parties, parties who have not made their respective appearances or their counsel by first class mail addressed as follows:

PATRICK MCCRORY
c/o Robert C. Stephens
General Counsel, Office of the Governor of North Carolina
116 West Jones Street
Raleigh, NC 27603-8001

NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY
c/o Deborah L. McSwain
NCDPS General Counsel
512 N. Salisbury Street
Raleigh, NC 27604

This the 27th day of May, 2016.

ROY COOPER
Attorney General

/s/ Olga E. Vysotskaya de Brito
Ms. Olga E. Vysotskaya de Brito
Special Deputy Attorney General

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)
Defendants.)
_____)

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Special Deputy Attorney General Amar Majmundar of the North Carolina Attorney General's Office enters his Notice of Appearance as counsel representing Defendant the State of North Carolina.

Respectfully submitted, this 31st day of May, 2016.

ROY COOPER
Attorney General

/s/ Amar Majmundar
Amar Majmundar
Special Deputy Attorney General
North Carolina State Bar No. 24668
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Raleigh, NC 27602
Telephone: (919) 716-6821
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Email: amajmundar@ncdoj.gov

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I, the undersigned attorney, do hereby certify that a copy of the foregoing pleading was served on the registered parties through the Court's Electronic Filing notification process.

I, the undersigned attorney, do hereby further certify that a copy of the foregoing pleading was served on the unregistered parties or their counsel by first class mail addressed as follows:

PATRICK MCCRORY
c/o Robert C. Stephens
General Counsel, Office of the Governor of North Carolina
116 West Jones Street
Raleigh, NC 27603-8001

NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY
c/o Deborah L. McSwain
NCDPS General Counsel
512 N. Salisbury Street
Raleigh, NC 27604

This the 31st day of May, 2016.

ROY COOPER
Attorney General

/s/ Amar Majmundar
Amar Majmundar
Special Deputy Attorney General