IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

| NAACP, et al., | * | |
|--|---|-------------------------|
| , , | * | |
| Plaintiffs, | * | |
| , | * | Case No. 1:17-cv-01427- |
| V. | * | TCB-WSD-BBM |
| | * | |
| BRIAN KEMP, in his official capacity | * | CONSOLIDATED CASES |
| as Secretary of State for the State of | * | |
| Georgia, | * | |
| | * | |
| Defendant. | * | |
| | * | |
| AUSTIN THOMPSON, et al., | * | |
| , | * | |
| Plaintiffs, | * | |
| , | * | |
| v. | * | |
| | * | |
| BRIAN KEMP, in his official capacity | * | |
| as Secretary of State of the State of | * | |
| Georgia, | * | |
| | * | |
| Defendant. | * | |

CONSENT MOTION TO EXTEND DEADLINE FOR RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION

Brian Kemp, defendant in his official capacity in these cases, moves for an extension of time of two business days to file his response to Plaintiffs' Motion for Preliminary Injunction [Doc. 103]. In support, Defendant states that:

1. Defendant's response to the motion for preliminary injunction is currently due on March 22, 2018;

2. The workload of Defendant's counsel has not permitted them sufficient time

to complete the response;

3. Defendant seeks a two (2) business day extension of time, until March 26,

2018;

4. The undersigned has conferred with Plaintiffs' counsel and is authorized to

state that Plaintiffs have no objection to this request for an extension of time;

5. In exchange for Plaintiffs' consent to this motion, Plaintiffs request a similar

two (2) business day extension for their reply brief to which Defendant

likewise consents;

6. Plaintiffs' reply brief is currently due on April 5, 2018;

7. Plaintiffs seek a two (2) business day extension of time, until April 9, 2018;

and

8. A proposed Order is attached for the Court's convenience.

WHEREFORE, this Court should extend the time for Defendant's response

to Plaintiffs' Motion for Preliminary Injunction to March 26, 2018, and the time

allowed for Plaintiffs' reply to April 9, 2018.

Respectfully submitted this 20th day of March, 2018.

CHRISTOPHER M. CARR

Attorney General 112505

ANNETTE M. COWART 191199

Deputy Attorney General

2

RUSSELL D. WILLARD 760280 Senior Assistant Attorney General

CRISTINA CORREIA 188620 Assistant Attorney General 40 Capitol Square SW Atlanta, GA 30334 ccorreia@law.ga.gov 404-656-7063 404-651-9325

s/ Frank B. Strickland

Frank B. Strickland Special Assistant Attorney General Georgia Bar No. 687600 fbs@sbllaw.net John J. Park, Jr. Georgia Bar No. 547812 jjp@sbllaw.net Barclay S. Hendrix Georgia Bar No. 917852 Barclay.hendrix@sbllaw.com STRICKLAND BROCKINGTON LEWIS LLP Midtown Proscenium Suite 2200 1170 Peachtree Street NE Atlanta, Georgia 30309 678-347-2200 (telephone) 678-347-2210 (facsimile)

Attorneys for Defendant

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing CONSENT MOTION TO EXTEND DEADLINE FOR RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(C).

s/ Frank B. StricklandFrank B. StricklandSpecial Assistant Attorney GeneralGeorgia Bar No. 687600

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2018, I served the within and foregoing CONSENT MOTION TO EXTEND DEADLINE FOR RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties to this matter via electronic notification or otherwise:

Jon Greenbuam
jgreenbaum@lawyerscommittee.org
Julie Houk
houk@lawyerscommittee.org
John Powers
jpowers@lawyerscommittee.org
Ezra Rosenberg
erosenberg@lawyerscommittee.org
Lawyers' Committee for Civil Rights
Under Law
1401 New York Avenue, Suite 400
Washington, DC 20005

William Vance Custer, IV bill.custer@bryancave.com Jennifer Burch Dempsey Jennifer.dempsey@bryancave.com Julia Fenwick Ost Julie.ost@bryancave.com Bryan Cave, LLP-ATL One Atlantic Center 14th Floor 1201 West Peachtree St, NW Atlanta, GA 30309-3488 Bradley S. Phillips
Brad.phillips@mto.com
Gregory D. Phillips
Gregory.phillips@mto.com
John F. Muller
Thomas P. Clancy
Thomas.clancy@mto.com
Munger, Tolles & Olson, LA-CA
50th Floor
350 South Grand Avenue
Los Angeles, CA 90071-1560

Quinton Washington quinton@bellwashington.com Bell & Washington LLP 196 Peachtree Street SW, Suite 310 Atlanta, GA 30303

Marc Erik Elias melias@perkinscoie.com Aria C. Branch abranch@perkinscoie.com Perkins Coie LLP 700 13th Street, N.W., Suite 600 Washington, D.C. 20005

Abha Khanna Akhanna@perkinscoie.com Perkins Coie LLP 1201 Third Avenue, Ste. 4900 Seattle, WA 98101

This 20th day of March, 2018.

<u>s/ Frank B. Strickland</u>Frank B. StricklandGeorgia Bar No. 687600

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

| NAACP, et al., | * | |
|--|---|-------------------------|
| | * | |
| Plaintiffs, | * | |
| | * | Case No. 1:17-cv-01427- |
| v. | * | TCB-WSD-BBM |
| | * | |
| BRIAN KEMP, in his official capacity | * | CONSOLIDATED CASES |
| as Secretary of State for the State of | * | |
| Georgia, | * | |
| | * | |
| Defendant. | * | |
| | * | |
| AUSTIN THOMPSON, et al., | * | |
| | * | |
| Plaintiffs, | * | |
| | * | |
| V. | * | |
| | * | |
| BRIAN KEMP, in his official capacity | * | |
| as Secretary of State of the State of | * | |
| Georgia, | * | |
| | * | |
| Defendant. | * | |

<u>ORDER</u>

This matter is before the Court on Defendant's Consent Motion to Extend Deadline for Response to Motion for Preliminary Injunction. For good cause shown, the Motion is hereby GRANTED. Defendant's time to respond to the motion for preliminary injunction is extended through and including March 26, 2018. Plaintiffs' time to reply is extended through and including April 9, 2018.

| SO ORDERED this day of | , 2018. | | |
|------------------------|------------------------------|--|--|
| | | | |
| | Timothy C. Batten, Sr. | | |
| | United States District Judge | | |

Prepared by:

Frank B. Strickland Special Assistant Attorney General Georgia Bar No. 687600 STRICKLAND BROCKINGTON LEWIS LLP Midtown Proscenium Suite 2200 1170 Peachtree Street NE Atlanta, Georgia 30309 678-347-2200 (telephone) 678-347-2210 (facsimile)