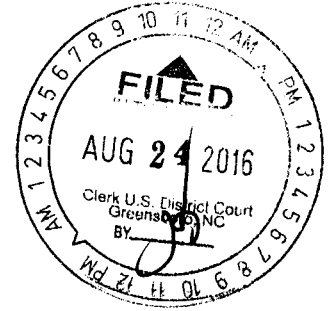


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



THE UNITED STATES OF AMERICA)
Plaintiffs,)

CASE # 1:16-CV-00425

v.)

PATRICK L. MCCRORY in his official)
Capacity as Governor of The State of North)
Carolina, NORTH CAROLINA DEPT. OF)
PUBLIC SAFETY; UNIVERISITY OF)
NORTH CAROLINA; and BOARD OF)
GOVERNORS OF THE UNIVERSITY)
OF NORTH CAROLINA)
Defendants.)

**STEVEN GLENN: JOHNSON'S MOTION TO ENLARGE TIME WITHIN WHICH TO
TIMELY FILE FRCiv.P, RULE 59 MOTION FOR REHEARING/RECONSIDERATION
OF THIS COURT'S MEMORANDUM ORDER DENYING INTERVENTION**

NOW COMES Steven-Glenn: Johnson here proceeding pro se, and files this his MOTION TO ENLARGE TIME WITHIN WHICH TO TIMELY FILE FRCiv.P, RULE 59 MOTION FOR REHEARING/RECONSIDERATION OF THIS COURT'S MEMORANDUM ORDER DENYING INTERVENTION and for cause will show the court as follows:

**I.
BACKGROUND**

1. Intervener's (hereafter: "Johnson") Motion to Intervene, etc. was properly filed and this court has responded with its MEMORANDUM ORDER denying intervention for reasons stated therein.
2. Johnson seeks to complete and file a FRCiv.P which pursuant to FRCivP, Rule 59 is due to be filed this date, i.e.: Monday, 22 August 16, and due to necessity this Motion for Enlargement of Time, etc. is being prepared intending to request and obtain from this

court reasonable and sufficient time to complete the research and preparation for a Rule 59 Motion made necessary due to the complexity of issues surrounding the present litigation in this case.

3. Accordingly, following is Intervener's (Johnson's) Motion to Enlarge time within which he may timely file his FRCivP, Rule 59 Motion for Rehearing/Reconsideration, etc. in this case.

II.

**MOTION TO ENLARGE TIME WITHIN WHICH PROPOSED INTERVENOR
JOHNSON'S RULE FRCivP, Rule 59 MOTION MAY BE TIMELY FILED**

4. Johnson is proceeding pro se respecting this appeal.
5. Johnson's is seeking to file this his First Motion for Enlargement of Time to Timely file a FRCivP, Rule 59, etc. Motion for Rehearing/Reconsideration, etc
6. Johnson has not previously requested any extension of time for any purposes in this case.

II.

**MOTION TO ENLARGE TIME WITHIN WHICH JOHNSON'S RULE FRCivP, Rule 59
MOTION MAY BE TIMELY FILED**

7. This is the first request made for an enlargement of time to file in this case moving this court for enlargement of time of twenty (20) days for purposes of completing the research, drafting and filing of his FRCivP, Rule 59, etc. Motion for Reconsideration/Rehearing, etc. .
8. Further, Johnson in this case is proceeding without the assistance of professional counsel and Johnson is not experienced nor trained in proceeding in a Federal case such as is pending in this matter.

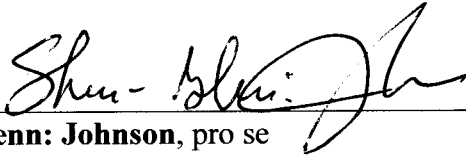
9. The added time requested is prudent since proceeding in this case has made necessary Johnson's FRCivP, Rule 59, etc Motion to address the complex issues raised by this court in its Memorandum Order. Further the issues raised by this court and by this proposed intervener are sufficiently complex to where Johnson finds it impossible to meet the present deadline for filing in this case of today, Monday, 22 August 16.
10. Accordingly, it is necessary and essential to make this request for enlargement of time to properly and fully research, draft and timely file Johnson's FRCivP, Rule 59, etc Motion.
11. No one will be injured by the court granting this Motion to Enlarge Time. On the contrary, should the added time not be granted then in that event, Johnson will be denied his due process right pursuant to First Amendment Constitutionally guaranteed Redress of Grievances and due process of law and only for want of time for the a full and proper research and preparation of the issues which have arisen in this case.
12. Accordingly, Johnson respectfully moves this court for an enlargement of time within which to properly research, complete and timely file his FRCivP, Rule 59, etc Motion for Rehearing/Reconsideration, etc. and request of this court a reasonable added time of twenty (20) days extension of time which will enlarge the date for timely filing from today, Monday, 22 August 16 to and including Sunday, 11 September 16.
13. Again, this request is being made so that justice may be done by affording to Johnson an opportunity to proceed in accordance to the rule of law, i.e.: FRCivP, Rule 59, etc. and Johnson's FRCivP, Rule 24(a) Right to intervene in this case. This motion to enlarge time is not being made for any purpose of delay.
14. Johnson respectfully reserves the right to alter, amend, modify and/or supplement, any of the foregoing pleading(s)

WHEREFORE PREMISES CONSIDERED, Johnson's, here proceeding pro se,

requests relief of this court as follows:

- A. That this court grant in all things this Johnson's motion/requests to enlarge the time within which Johnson's FRCivP, Rule 59, etc Motion for Rehearing/Reconsideration, etc. may be properly and fully researched, completed and timely filed with the clerk of this court and that the time within which Johnson's said Motion may be timely filed and be enlarged by a reasonable time of twenty (20) days from today, Monday, 22 August 16 to and including Sunday, 11 September 16, and:
- B. Johnson further request from this court added relief at law and/or in equity to which this court may deem just and proper, and:
- C. Johnson request justice.

Respectfully submitted:



Steven-Glenn: Johnson, pro se
208 Nydegg Road
New Bern, NC 28562
252-665-3060

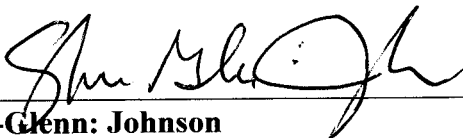
CERTIFICATE OF SERVICE

I, **STEVEN-GLENN: JOHNSON**, hereby certify that a true and correct copy of this Motion to Enlarge Time within which to file Johnson's FRCivP, Rule 59 Motion for Rehearing/Reconsideration, etc. in this case has, on this the 22 day of August 2016, been served via US Postal Service to all counsel of record for the parties and counsel of record in this case:

Ripley Rand
US Attorney
US Dept. of Justice
101 South Edgeworth St., 4th Floor
Greensboro, NC 27401

And

MILLBERG GORDON STEWART PLLC
William W. Stewart, Jr.
Counsel for:
THE STATE OF NORTH CAROLINA
Office of the Governor
And
North Carolina Dept. of Safety
1101 Haynes Street, Suite 104
Raleigh, NC 27604



Steven-Glenn: Johnson

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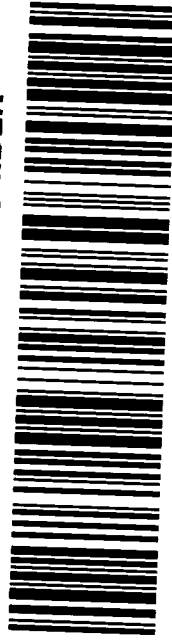
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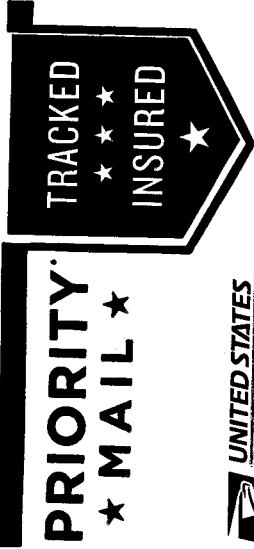


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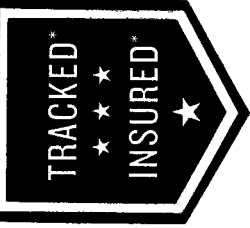
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