

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

**ALINA BOYDEN and
SHANNON ANDREWS,**

Plaintiffs

Case No. 17-cv-264

vs.

**STATE OF WISCONSIN DEPARTMENT
OF EMPLOYEE TRUST FUNDS, et al.,**

Defendants.

MOTION FOR EXTENSION OF TIME

Plaintiffs, Alina Boyden and Shannon Andrews, through their attorneys, Hawks Quindel, S.C., by Nicholas E. Fairweather and Michael R. Godbe, the American Civil Liberties Union of Wisconsin Foundation, by Laurence J. Dupuis, and the American Civil Liberties Union Foundation, by John A. Knight, move the Court for an order pursuant to Fed. R. Civ. P. 6(b)(1) extending their time to respond to the Motion to Dismiss filed by Defendant, Dean Health Plan, Inc. (“Dean”), on June 28, 2017, and show the Court as follows:

1. On June 28, 2017, Dean filed a Motion to Dismiss and Memorandum of Law in Support of their Motion to Dismiss (Dkt. 30 and Dkt. 31).
2. Pursuant to the Court’s order, Plaintiffs’ response to Dean’s Motion to Dismiss is due on or before July 19, 2017.

3. Between the date of this filing and the date Plaintiffs' response is due, Plaintiffs' counsel John A. Knight will be out of the country on a previously scheduled vacation, returning on July 11, 2017.

4. Prior to filing this motion, the undersigned counsel conferred with counsel for Dean.

5. Dean opposes Plaintiffs' request for an extension of time to respond to Dean's Motion to Dismiss.

6. On June 30, 2017, the Court granted Plaintiffs' Motion for Extension of Time (Dkt. 32 and Dkt. 33¹) to respond to the Motion to Dismiss filed by Defendants, State of Wisconsin Department of Employee Trust Funds, State of Wisconsin Group Insurance Board, Robert J. Conlin, Secretary of the Department of Employee Trust Funds, Board of Regents of the University of Wisconsin System, Raymond W. Cross, President of the University of Wisconsin System, Rebecca M. Blank, Chancellor of the University of Wisconsin-Madison, University of Wisconsin School of Medicine and Public Health and Robert N. Golden, M.D., Dean of the University of Wisconsin School of Medicine and Public Health ("State Defendants"), on June 22, 2017. The Court extended the deadline for Plaintiffs' to respond to State Defendants' Motion to Dismiss until August 11, 2017, and the deadline for State Defendants to reply until August 21, 2017.

7. Plaintiffs Alina Boyden and Shannon Andrews respectfully request the Court grant this motion and order that Plaintiffs may file their response to Defendant

¹ Dkt. 33 is a Text Only Order dated June 30, 2017, granting Plaintiffs' Motion for Extension of Time (Dkt. 32).

Dean Health Plan, Inc.'s Motion to Dismiss on or before August 11, 2017 and that the date by which Dean must file its reply brief be extended to August 21, 2017, thus placing both motions to dismiss on the same schedule.

Dated this 10th day of July, 2017.

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