

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

CODY FLACK,
SARA ANN MAKENZIE,
MARIE KELLY, and
COURTNEY SHERWIN,

Plaintiffs,

Case No. 3:18-cv-00309-WMC
Judge William Conley

v.

WISCONSIN DEPARTMENT OF
HEALTH SERVICES and
LINDA SEEMEYER, in her official capacity
as Secretary of the Wisconsin Department of
Health Services,

Defendants.

**AGREED MOTION FOR EXTENSION OF TIME TO
FILE A BRIEF IN SUPPORT OF ITS OBJECTION**

MercyCare Insurance Company, (hereinafter referred to as “MercyCare”) by and through its attorney, Lindsay Renier, requests this Honorable Court to enter an Order extending the time in which MercyCare has been granted to file a brief in support of its objection to the subpoena. In support thereof, MercyCare states as follows:

1. That MercyCare received the Order from this Honorable Court granting MercyCare until March 1, 2019, to file a brief in support of its objection, immediately after the same was entered on February 22, 2019 at 3:18 PM;

2. That MercyCare’s sole litigation attorney, Lindsay Renier, was leaving for a pre-planned family vacation at 4:00 PM on February 22, 2019, and is scheduled to return on March 3, 2019;

3. That Lindsay Renier currently does not have access to any documents requested by subpoena at the time of drafting this motion;

4. That Lindsay Renier has only limited access to the Mercy Health Corporation systems, necessary to draft a brief, while on her family vacation;

5. That Lindsay Renier is not requesting an extension to cause undue delay to any party.

MercyCare respectfully requests this Honorable Court enter an Order extending the time to file a brief in support of its objection by one week, thereby creating a deadline of March 8, 2019. By agreement, Plaintiff's Response brief would be due on March 15, 2019 and MercyCare is waiving its right to file a reply brief.

Respectfully submitted,

MercyCare Insurance Company

BY: s/ Lindsay Renier

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And MercyCare Insurance Company
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