

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

CHRISTOPHER DOYLE, LPC, LCPC,)
individually and on behalf of his clients,)
)
Plaintiff,) Civil Action No. 1:19-cv-00190-DKC
)
v.) **INJUNCTIVE RELIEF SOUGHT**
)
LAWRENCE J. HOGAN, JR., Governor of)
the State of Maryland, in his official capacity,)
and BRIAN E. FROSH, Attorney General of)
the State of Maryland, in his official capacity,)
)
Defendants.)
)

**PLAINTIFF’S RESPONSE IN PARTIAL OPPOSITION TO
DEFENDANTS’ MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT AND MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff’s counsel believe in litigation courtesies and are ready and willing to extend them, as warranted and appropriate. Plaintiff readily agreed to a three-week extension of time for Defendants to respond to Plaintiff’s Complaint. Were it not for the irreparable harm that Plaintiff is suffering each and every day the challenged law remains in effect, Plaintiff would also agree to an extension of Defendants’ deadline to respond to the preliminary injunction motion. In light of that irreparable harm, however, occurring daily as detailed in Plaintiff’s motion for preliminary injunction, Plaintiff is unable to agree to that portion of Defendants’ request.

The very purpose of preliminary injunctions is to provide early relief in urgent situations. Doubling Defendants’ response time would defeat that purpose and allow Defendants’ flatly unconstitutional statute to continue to inflict daily harm upon Plaintiff, his clients, and others similarly situated. Accordingly, Plaintiff respectfully requests that the Court leave Defendants’ preliminary injunction opposition deadline unchanged and set a preliminary injunction hearing at the Court’s earliest opportunity.

Respectfully submitted,

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[†] Admitted to appear *pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been filed this February 4, 2019, through the Court's ECF system, which will send a notice of electronic filing to all parties and counsel of record, including the following:

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