

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CHRISTOPHER DOYLE, LPC, LCPC,

Plaintiff,

v.

LAWRENCE J. HOGAN, JR, *et al.* ,

Defendants.

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Civil Action No. 1:19-CV-00190-DKC

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**REPLY MEMORANDUM IN FURTHER SUPPORT OF MOTION FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT
AND MOTION FOR PRELIMINARY INJUNCTION**

The defendants, Lawrence J. Hogan, Jr., Governor, and Brian E. Frosh, Attorney General, moved for an extension of time to file their responses to the plaintiff’s complaint and motion for a preliminary injunction to and including March 8, 2019 to allow adequate time for the research and investigation necessary to prepare appropriate responses. The plaintiff, Christopher Doyle, opposed the request for an extension of time to respond to the motion for a preliminary injunction because of the alleged irreparable harm that he is suffering. ECF Document 19 at 1. Mr. Doyle, however, waited until eight months after the Governor signed SB 1028 and three and one-half months after its effective date to file this lawsuit. *See* ECF Document 1 ¶¶ 2. Given the delay in challenging the new law and the time that the delay gave Mr. Doyle to prepare for this lawsuit, a four-week delay for the defendants to respond is only fair.

Furthermore, Mr. Doyle does not allege that he practices in the State of Maryland, only that he is licensed in Maryland. *See* ECF Document 1 ¶¶ 13, 97-126. He also does not allege that he has been the subject of any complaint to the Maryland State Board of Professional

