

**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. )  
 )

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**PLAINTIFF’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE CONSOLIDATED  
RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS AND  
REPLY IN SUPPORT OF PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff, CHRISTOPHER DOYLE, LPC, LCPC (“Doyle”), pursuant to Local Rule 105, and on an unopposed basis, moves the Court for a two-week extension of time, to an including April 5, 2019, to file his response in opposition to Defendants’ Motion to Dismiss (Doc. 26) and his reply in support of Plaintiff’s Motion for Preliminary Injunction (Doc. 2). Doyle shows the Court as follows in support of this motion:

1. Pursuant to Local Rule 105.2, Doyle’s response in opposition to Defendants’ Motion to Dismiss (Doc. 26), and his reply in support of Plaintiffs’ Motion for Preliminary Injunction (Doc. 2), are due to be filed on or before March 22.

2. Due to the travel schedules of Doyle’s counsel, and the press of their other professional obligations, Doyle needs a two-week extension of time, to and including April 5, 2019, to file his response and reply.

3. The travel and professional obligations of Doyle's counsel between now and April 1, necessitating the requested extension of time, include the following:

- a. Depositions scheduled in California every business day this month;
- b. Deposition scheduled in Boston;
- c. Three federal appellate briefs due; and
- d. In this case, depositions of Doyle and Defendants' Rule 30(b)(6) designee.

4. Granting the relief requested herein will not prejudice any party, or unduly delay the efficient resolution of this case or the administration of justice. The requested filing date of April 5 is still approximately one week before the currently scheduled preliminary injunction hearing. Furthermore, for the convenience of the Court and the parties, Doyle intends to consolidate his response and reply into a single filing, because many of the factual and legal issues overlap.

5. Pursuant to Local Rule 105.9, the undersigned counsel conferred with counsel for Defendants, and is authorized to represent to the Court that Defendants do not oppose Doyle's requested extension of time.

/s/ John R. Garza  
(signed by Roger K. Gannam  
with permission of John R. Garza)  
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*Attorneys for Plaintiff*

<sup>†</sup> Admitted to appear *pro hac vice*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been filed this March 18, 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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/s/ Roger K. Gannam  
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