

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

DARCY CORBITT, DESTINY CLARK, )  
and JOHN DOE, )

Plaintiffs, )

v. )

HAL TAYLOR, in his official capacity as )  
Secretary of the Alabama Law Enforcement )  
Agency; Colonel CHARLES WARD, in his )  
official capacity as Director of the )  
Department of Public Safety; DEENA )  
PREGNO, in her official capacity as Chief )  
of the Driver License Division, and )  
JEANNIE EASTMAN, in her official )  
capacity as Driver License Supervisor in the )  
Driver License Division, )

Defendants. )

Civil Action No.  
2:18-cv-00091-MHT-GMB  
**UNOPPOSED**

**DEFENDANTS' UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants Hal Taylor, Charles Ward, Deena Pregno, and Jeannie Eastman move the Court for a 14-day extension of time to respond to plaintiffs' complaint, and in support thereof state the following:

1. Defendants were served on February 13, 2018, and their response to plaintiffs' complaint is currently due March 6, 2018.
2. The parties have met and are currently exploring the possibility of proceeding in this case, with the Court's approval, using little or no formal

discovery and using stipulated facts to support the filing of cross-motions for summary judgment in an expeditious manner. However, the parties need time to determine first whether they can stipulate to all material facts without the necessity of formal discovery. If the parties agree that they can so stipulate, they would then request a meeting with the Court to ensure that such cross-motions for summary judgment would dispose of this case (subject to the parties' appellate rights). *See* Fed. R. Civ. P. 1 (stating the Rules of Civil Procedure are to be construed "to secure the just, speedy, and inexpensive determination of every action . . .").

3. Defendants cannot determine the best way to respond to plaintiffs' complaint until the parties resolve the issue of whether formal discovery is necessary in this case. As a result, defendants request a 14-day extension of time to respond to plaintiffs' complaint to allow the parties to continue to explore the most appropriate way to resolve the claims in this suit.

4. Plaintiffs do not oppose this motion.

WHEREFORE, defendants respectfully request the Court enter an order extending the time for defendants to respond to plaintiffs' complaint to and including **March 20, 2018**.

Respectfully submitted,

Steve Marshall  
*Attorney General*

By:

/s Brad A. Chynoweth  
Brad A. Chynoweth (ASB-0030-S63K)  
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**Counsel for Defendants**

**CERTIFICATE OF SERVICE**

I certify that on February 28, 2018, I filed the foregoing electronically using the Court's CM/ECF system, which will serve all counsel of record.

/s Brad A. Chynoweth  
Counsel for Defendants