

**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 another 14-day extension of time to respond to plaintiffs' complaint, and in support thereof state the following:

1. Defendants moved for an extension of time to answer plaintiffs' complaint after the parties met to discuss the possibility, with the Court's approval, of using stipulated facts to support the filing of cross-motions for summary judgment with little or no formal discovery. (Doc. 17.) Plaintiffs did not oppose this motion,

and the Court granted the extension of time with defendants' response currently due on March 20, 2018. (Doc. 19.)

2. In the interim, the parties have deliberated internally about whether they can stipulate to all relevant facts they deem material to the resolution of the claims and defenses in this case. The parties have not yet exchanged proposed stipulated facts to each other but anticipate doing so over the course of the next two weeks.

3. Until defendants know how the case will proceed, they cannot determine the best way to respond to plaintiffs' complaint. As a result, defendants request another 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. Defendants do not anticipate seeking another extension of time.

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 **April 3, 2018**.

Respectfully submitted,

Steve Marshall
Attorney General

By:

/s Brad A. Chynoweth
Brad A. Chynoweth (ASB-0030-S63K)
Winfield J. Sinclair (ASB-1750-S81W)
Assistant Attorneys General

State of Alabama
Office of the Attorney General
501 Washington Avenue
Montgomery, Alabama 36130
(334) 242-7300
(334) 353-8440 (fax)
bchynoweth@ago.state.al.us
wsinclair@ago.state.al.us

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on March 15, 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