

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. Pastor Council, et al.

Plaintiffs,

v.

Case No. 4:18-cv-00824-O

**Equal Employment Opportunity
Commission**, et al.,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND TIME TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS FOR LACK
OF SUBJECT-MATTER JURISDICTION**

The plaintiffs respectfully request a 28-day extension to respond to the defendants' motion to dismiss for lack of subject-matter jurisdiction. The current deadline for the plaintiffs to respond is March 1, 2019. *See* Order of January 29, 2019, ECF No. 15. The extension sought would move that deadline to March 29, 2019. The plaintiffs have conferred with the defendants and they are unopposed to this request.

The plaintiffs are requesting this extension because there have been new factual developments that may alleviate some or all of the defendants' jurisdictional objections, and the plaintiffs intend to discuss these matters with the defendants in an attempt to reduce the number of disputed issues for this Court to resolve. Counsel for the plaintiffs also has numerous briefing deadlines to meet in other cases that he is litigating in March, and an extension until March 29, 2019, would provide sufficient time for the parties to discuss these new issues and decide how to proceed.

If the Court grants this unopposed extension, the defendants would request a 21-day extension that would make their reply brief due on April 19, 2019.

The parties have held their scheduling conference and intend to file their joint status report on March 5, 2019, as required by the Court's order of January 29, 2019. They are not seeking to extend those deadlines.

CONCLUSION

The unopposed motion to extend time should be granted. The date for the plaintiffs to respond to the defendants' motion to dismiss for lack of subject-matter jurisdiction should be extended to March 29, 2019, and the date for the defendants to file their reply brief should be extended to April 19, 2019.

Respectfully submitted.

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Dated: February 27, 2019

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*Counsel for Plaintiffs and
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CERTIFICATE OF CONFERENCE

I certify that on February 25, 2019, I conferred with Eric J. Soskin, counsel for the defendants, and he informed me that the defendants are unopposed to this motion.

/s/ Jonathan F. Mitchell
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the Proposed Classes*

CERTIFICATE OF SERVICE

I certify that on February 27, 2019, I served this document through CM/ECF upon:

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[PROPOSED] ORDER GRANTING MOTION TO EXTEND TIME

The plaintiffs' motion to extend time to respond to the defendants' motion to dismiss for lack of subject-matter jurisdiction is granted.

The plaintiffs' response is due on March 29, 2019, and the defendants' reply brief is due on April 19, 2019.

Dated: _____, 2019

REED O'CONNOR
UNITED STATES DISTRICT JUDGE