

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

**Bear Creek Bible Church, et al.,**

Plaintiffs,

v.

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

Defendants.

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

**UNOPPOSED MOTION FOR LEAVE TO EXTEND DEADLINE  
FOR FILING CONSOLIDATED RESPONSE AND REPLY BRIEF**

The plaintiffs' deadline for filing their consolidated brief responding to the defendants' cross-motion for summary judgment and their reply brief in support of their own motion for summary judgment was July 12, 2021. *See* Order (ECF No. 97). The lead counsel for the plaintiffs, Jonathan F. Mitchell, expected and had hoped to finish the brief before midnight on July 12, 2021, but was unable to do so and filed the brief slightly before 2:00 A.M. on Tuesday, July 13, 2021. The plaintiffs respectfully ask the Court to extend their deadline for filing this brief by one day, nunc pro tunc. We have conferred with counsel for the defendants and they are unopposed to this motion, and they will not need a corresponding extension of their deadline to file their reply, which is currently due on July 16, 2021. A proposed order is attached.

Respectfully submitted.

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Dated: July 13, 2021

*Counsel for Plaintiffs and  
the Proposed Classes*

### CERTIFICATE OF CONFERENCE

I certify that on July 13, 2021, I conferred with Benjamin T. Takemoto, counsel for the defendants, and he informed me that the defendants are unopposed to this motion.

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
*Counsel for Plaintiffs and  
the Proposed Classes*

### CERTIFICATE OF SERVICE

I certify that on July 13, 2021, I served this document through CM/ECF upon:

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**[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED  
MOTION FOR LEAVE TO EXTEND DEADLINE FOR FILING  
CONSOLIDATED RESPONSE AND REPLY BRIEF**

The plaintiffs' motion to extend the deadline for filing their consolidated brief responding to the defendants' cross-motion for summary judgment and their reply brief in support of their own motion for summary judgment is granted. The brief submitted on July 13, 2021, is deemed to be properly filed, nunc pro tunc.

Dated: \_\_\_\_\_, 2021

\_\_\_\_\_  
REED O'CONNOR  
UNITED STATES DISTRICT JUDGE