

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF KENTUCKY  
LOUISVILLE DIVISION

**Chelsey Nelson Photography LLC,  
and Chelsey Nelson,**

Plaintiffs,

v.

**Louisville/Jefferson County Metro  
Government; Louisville Metro  
Human Relations Commission-  
Enforcement; Louisville Metro  
Human Relations Commission-  
Advocacy; Verná Goatley,** in her  
official capacity as Executive Director of  
the Louisville Metro Human Relations  
Commission-Enforcement; and **Marie  
Dever, Kevin Delahanty, Charles  
Lanier, Sr., Leslie Faust, William  
Sutter, Ibrahim Syed, and Leonard  
Thomas,** in their official capacities as  
members of the Louisville Metro  
Human Relations Commission-  
Enforcement,

Defendants.

Case No. 3:19-cv-00851-BJB-CHL

**Joint Motion for Extensions of  
Time and Page Limits**

On September 1, 2021, Plaintiffs filed a motion for summary judgment (ECF No. 92-1). On September 22, 2021, Defendants filed a combined response to Plaintiffs' motion for summary judgment and cross-motion for summary judgment (ECF No. 97). On August 30, 2021, Plaintiffs filed a motion to exclude the testimony of Professor Netta Barak-Corren (ECF No. 90), and Defendants filed a motion to exclude the testimony of George Yancey, Ph.D. (ECF No. 91). On September 29, 2021, the parties filed their responses to the other party's motion to exclude (ECF

Nos. 99, 100).

The parties have conferred about the above motions and have agreed to the following briefing schedule and page limits. *See* LR 7.1(b), (d).

*First*, Plaintiffs' combined reply in support of their motion for summary judgment and response to Defendants' cross-motion for summary judgment shall be due on or before October 20, 2021 and shall not exceed 35 pages.

*Second*, Defendants' reply in support of their cross-motion for summary judgment shall be due within 21 days of Plaintiffs' combined motion for summary judgment response, and it shall not exceed 30 pages.

*Third*, the parties' replies in support of their respective motions to exclude shall be due on or before October 25, 2021, with normal page limits.

Extending the page limits for the summary judgment briefs is warranted because this case raises important constitutional and statutory issues. This proposal also streamlines the briefing by eliminating Plaintiffs' reply in support of their summary judgment motion and presents the issues to the Court in the most concise and orderly way. The parties request that this Court grant this motion to extend the deadlines and page limits as set forth above.

Respectfully submitted this 5th day of October, 2021.

By: s/ Bryan D. Neihart

By: s/ Casey L. Hinkle (w/permission)

<p>Ryan Bangert TX Bar No. 24045446* Jonathan A. Scruggs AZ Bar No. 030505* Katherine L. Anderson AZ Bar No. 033104* Bryan D. Neihart AZ Bar No. 035937* <b>Alliance Defending Freedom</b> 15100 N. 90th Street Scottsdale, AZ 85260 Telephone: (480) 444-0020 <a href="mailto:rbangert@adflegal.org">rbangert@adflegal.org</a> <a href="mailto:jscruggs@adflegal.org">jscruggs@adflegal.org</a> <a href="mailto:kanderson@adflegal.org">kanderson@adflegal.org</a> <a href="mailto:bneihart@adflegal.org">bneihart@adflegal.org</a></p> <p>Hailey M. Vrdolyak IL Bar No. 6333515* <b>Alliance Defending Freedom</b> 440 First Street NW, Suite 600 Washington, DC 20001 Telephone: (202) 393-8690 <a href="mailto:hvrldolyak@adflegal.org">hvrldolyak@adflegal.org</a></p> <p>David A. Cortman GA Bar No. 188810* <b>Alliance Defending Freedom</b> 1000 Hurricane Shoals Road NE Suite D-1100 <a href="mailto:dcortman@adflegal.org">dcortman@adflegal.org</a></p> <p>Joshua D. Hershberger KY Bar No. 94421 <b>Hershberger Law Office</b></p>	<p>David S. Kaplan Casey L. Hinkle <b>Kaplan Johnson Abate &amp; Bird LLP</b> 710 W. Main Street, 4<sup>th</sup> Floor Louisville, KY 40202 (502)-416-1630 <a href="mailto:dkaplan@kaplanjohnsonlaw.com">dkaplan@kaplanjohnsonlaw.com</a> <a href="mailto:chinkle@kaplanjohnsonlaw.com">chinkle@kaplanjohnsonlaw.com</a></p> <p><b>Mike O’Connell</b> <b>Jefferson County Attorney</b></p> <p>John F. Carroll Jason D. Fowler Assistant Jefferson County Attorneys 531 Court Place, Ste. 900 Louisville, Kentucky 40202 (502) 574-6321 <a href="mailto:john.carroll2@louisvilleky.gov">john.carroll2@louisvilleky.gov</a> <a href="mailto:jason.fowler@louisvilleky.gov">jason.fowler@louisvilleky.gov</a></p> <p><i>Attorneys for Defendants</i></p>
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<p>P.O. Box 233 Hanover, IN 47243 Telephone: (812) 274-0441 <a href="mailto:josh@hlo.legal">josh@hlo.legal</a> * Admitted <i>Pro Hac Vice</i>  <i>Attorneys for Plaintiffs</i></p>	
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**Certificate of Service**

I hereby certify that on October 5, 2021, I electronically filed the foregoing document with the Clerk of Court via the CM/ECF system.

By: s/ Bryan D. Neihart

Bryan Neihart  
AZ Bar No. 035937\*  
**Alliance Defending Freedom**  
15100 N. 90th Street  
Scottsdale, AZ 85260  
Telephone: (480) 444-0020  
bneihart@adflegal.org

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**[Proposed] Order Granting Joint  
Motion for Extensions of Time and  
Page Limits**

The parties filed motions for summary judgment and motions to exclude or limit the testimony to be admitted from the other party's expert witness. See Doc. Nos. 90, 91, 92-1, 97. Pursuant to Local Rules 7.1(b) and 7.1(d), the parties have agreed to a briefing schedule and an extension of page limits. The parties filed a joint motion for extension of time and page limits.

In light of the parties' agreement and the Court being otherwise duly advised, it is hereby ORDERED that the parties' joint motion is GRANTED.

Accordingly, it is further ORDERED that:

Plaintiffs' combined reply in support of their motion for summary judgment and response to Defendants' cross-motion for summary judgment shall be due on or before October 20, 2021 and shall not exceed 35 pages.

Defendants' reply in support of their cross-motion for summary judgment shall be due within 21 days of Plaintiffs' combined motion for summary judgment response, and it shall not exceed 30 pages.

The parties' replies in support of their respective motions to exclude shall be due on or before October 25, 2021, with normal page limits.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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UNITED STATES DISTRICT JUDGE

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By: s/ Bryan D. Neihart

Bryan Neihart  
AZ Bar No. 035937\*  
**Alliance Defending Freedom**  
15100 N. 90th Street  
Scottsdale, AZ 85260  
Telephone: (480) 444-0020  
bneihart@adflegal.org