

Nos. 22-5884, 22-5912

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**UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT**

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CHELSEY NELSON PHOTOGRAPHY, LLC; CHELSEY NELSON,

*Plaintiffs-Appellees / Cross-Appellants,*

v.

LOUISVILLE-JEFFERSON COUNTY, KY METRO GOVERNMENT, ET AL.,

*Defendants-Appellants / Cross-Appellees.*

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On Appeal from the United States District Court  
for the Western District of Kentucky, Louisville Division  
Case No. 3:19-cv-00851

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**APPELLEES'/CROSS-APPELLANTS' MOTION FOR EXTENSION  
OF TIME TO RESPOND TO MOTION TO REMAND**

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Appellees/Cross-Appellants Chelsey Nelson Photography LLC and Chelsey Nelson (“Nelson”) respectfully request an extension of time to respond to Appellants/Cross-Appellees’ (“Louisville”) Motion to Remand. Metro.Mot., ECF No. 60–1. Nelson’s response is currently due Monday, August 7, 2023. Fed. R. App. P. 27(a)(3)(A). Louisville’s reply, if any, would be due by Monday, August 14, 2023. Fed. R. App. P. 27(a)(4).

The parties’ counsel have conferred and do not oppose brief extensions to these deadlines. These extensions will give the parties the opportunity to address the issues raised in Louisville’s motion and this Court’s questions related to that motion raised during oral arguments.

Accordingly, Nelson requests that her response to Louisville’s motion be due by Friday, August 25, 2023. Likewise, Nelson’s counsel agree to provide Louisville with an equivalent extension through Tuesday, September 19, 2023 within which to file its reply.

Dated: July 28, 2023

Respectfully submitted,

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## CERTIFICATE OF COMPLIANCE

This motion complies with the word limit of Fed. R. App. P. 27(d)(2)(A) because it contains 139 words, excluding parts of the motion exempted by Fed. R. App. P. 32(f) and 6 Cir. R. 32(b).

This motion complies with Fed. R. App. P. 27(d)(1)(E) and the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in Word 365 using a proportionally doubled-spaced typeface, 14-point Century Schoolbook.

Dated: July 28, 2023

*s/John J. Bursch*  
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John J. Bursch

*Attorney for Plaintiffs-  
Appellees / Cross-Appellants*

## CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2023, I electronically filed the foregoing motion with the Clerk of the Court for the United States Court of Appeals for the Sixth Circuit by using the appellate CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*s/John J. Bursch*  
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