

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

**Braidwood Management Inc., et al.,**

Plaintiffs,

v.

**Xavier Becerra, et al.,**

Defendants.

Case No. 4:20-cv-00283-O

**JOINT MOTION TO EXTEND DEADLINE FOR FILING  
APPLICATION FOR ATTORNEYS' FEES**

On March 30, 2023, the Court entered final judgment in this case. *See* ECF No. 114. Under Rule 54(d)(2)(B)(i), the plaintiffs' application for attorney's fees and costs is due 14 days after this entry of judgment. *See* Fed. R. Civ. P. 54(d)(2)(B)(i). The parties respectfully ask the Court to extend this deadline until 14 days after the conclusion of direct appeals, which will occur on: (1) The date on which the time for filing a notice of appeal or petition for writ of certiorari expires; (2) The date on which the Supreme Court of the United States denies certiorari; or (3) The date on which the judgment of this Court or the judgment of the U.S. Court of Appeals for the Fifth Circuit is affirmed or reversed by the Supreme Court, without remand for further proceedings.

The parties agree that it would promote the efficient use of the Court's and the parties' limited resources to extend the deadline, as the plaintiffs' entitlement to costs and fees (as well as the amount of those costs and fees) will depend on the eventual appellate resolution of the issues in this case. A proposed order is attached.

Respectfully submitted.

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Dated: April 11, 2023

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**CERTIFICATE OF SERVICE**

I certify that on April 11, 2023, I served this document through CM/ECF upon:

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**[PROPOSED] ORDER GRANTING MOTION TO EXTEND  
DEADLINE FOR FILING APPLICATION FOR COSTS AND FEES**

The joint motion to extend time for the plaintiffs to file an application for costs and attorneys' fees is GRANTED. The plaintiffs shall submit their application for costs and fees no later than 14 days after the conclusion of direct appeals.

Dated: \_\_\_\_\_

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