UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

HORACE B. EDWARDS, et al. Plaintiffs,)
v.) Civil No. 2:14-CV-02631-JAR-TJJ
EDWARD JOSEPH SNOWDEN, et al.	<u> </u>
Defendants.	MOTION (AGREED) FOR
	EXTENSION OF TIME TO FILE
	RESPONSES TO DEFENDANTS'
	MOTION TO DISMISS (DOC. 13)
	AND MEMORANDUM IN
	OPPOSITION (DOC. 30)

With the agreement of Defense Counsel for all served defendants herein, Plaintiff moves the Court to grant an Extension of Time to file a Response to Defendants' Motion to Dismiss, (Doc. 13 and its Memo Doc. 14) and Extend the Time to file a Response to Defendants' Memorandum in Opposition (Doc. 30) related to Plaintiff's Motion to File a Second Amended Complaint (Doc. 19), combining both due dates to March 23, 2015.

In support thereof and pursuant to D.Kan.R. 6.1 Plaintiff states as follows:

- 1. There has been prior consultation with Mr. Rhodes, counsel for all existing and served defendants (except Snowden), and he agrees to this Extension for both responses until the proposed date, March 23, 2015.
- 2. The date for the Response to Doc. 13 is March 3, 2015 and the date for Response to Doc. 30 would be March 16, 2015.
 - 3. No prior extensions have been requested or granted.
- 4. The reason for the requested extensions is the parties are attempting to make the best use, logistically and economically, of the Court's and counsel's time, given the issues to be adjudicated, while not totally aligned, they are certainly related and therefore it occurs to counsel

for both sides that it makes sense to combine the due dates for these responses.

Plaintiff respectfully moves the Court to grant the extensions to March 23, 2015. A proposed Order, with a copy to opposing counsel, is sent separately via email to the Court.

Respectfully Submitted,

/s/ Jean Lamfers
LAMFERS & ASSOCIATES, LC
Jean Lamfers # 12707
7003 Martindale
Shawnee, KS 66218
(913) 962-8200
jl@lamferslaw.com
Attorney for Plaintiff Horace B. Edwards

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served via ECF/email to each attorney listed below this 3rd day of March, 2015 to the following:

Bernard Rhodes
brhodes@lathropgage.com
Lathrop & Gage LLP
2345 Grand Blvd., Suite 2400
Kansas City, MO 64108

Marvin S. Putnam

mputnam@omm.com

Daniel D. Ambar

dambar@omm.com

O'Melveny & Myers LLP

1999 Avenue of the Stars, 7th Fl.

Los Angeles, CA 90067

/s/Jean Lamfers
Attorney for Horace B. Edwards

2:14-cv-02631-JAR-TJJ Edwards et al v. Snowden et al

Julie A. Robinson, presiding Teresa J. James, referral **Date filed:** 12/19/2014

Date of last filing: 03/03/2015

Full docket text for document 32:

ORDER granting [31] Motion for Extension of Time to File Response re [13] MOTION to Dismiss Plaintiff's First Amended Complaint, and to File Reply re[19] MOTION to File Second Amended Complaint. The response/reply deadline is extended to 3/23/2015. Signed by District Judge Julie A. Robinson on 3/3/2015. (This is a TEXT ENTRY ONLY. There is no pdf document associated with this entry.) (as)