PLAINTIFF'S MOTION FOR EXTENSION OF TIME

Dockets.Justia.com

CASE NO. 3:11-cv-03218-JSW

Doc 48

Reynolds v. Lomas

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Plaintiff Michael S. Reynolds, through his undersigned attorneys, hereby moves the Court
for a brief extension of time within which to respond to Defendant Alton Anderson Lomas's
Motion for Relief From Judgment ("Motion"), up to and including August 28, 2012, and in
support of this motion, states as follows:

- 1. Defendant filed his Motion for Reconsideration on August 9, 2012. (Doc. 45.)
- 2. Under Local Civil Rule 7 - 3, and Federal Rules of Civil Procedure 5 and 6, Plaintiff's opposition to the Motion is due on Thursday, August 23, 2012.
- At the time the Motion was filed, Plaintiff's litigation counsel had withdrawn from the case, and Plaintiff's collections counsel had substituted therein. Due to the need for Plaintiff's litigation counsel to substitute back into the case and to familiarize themselves with the status of the case and the nature of the Motion, Plaintiff requests additional time, up to and including Tuesday, August 28, 2012, in which to respond to the Motion.
  - This is Plaintiff's first request for extension of time. 4.
- 5. The extension is not sought for purposes of delay and, if granted, will not prejudice any party.

WHEREFORE, Plaintiff Michael S. Reynolds respectfully requests this Court grant an extension up to and including Tuesday, August 28, 2012 within which Plaintiff may respond to Defendant's Motion for Relief from Judgment.

SNR DENTON US LLP Dated: August 21, 2012

> /s/Megan Barker Megan L. Barker

Attorney for Plaintiff MICHAEL S. REYNOLDS

Defendant Alton Anderson Lomas's reply shall be filed by no later than September 4, 2012.

-2-

SO ORDERED:

Dated: August 22, 2012

ES DISTRICT JUDGE