IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

CODE REVISION COMMISSION on behalf of and for the benefit of THE GENERAL ASSEMBLY OF GEORGIA, and THE STATE OF GEORGIA,

Plaintiff,

V.

PUBLIC.RESOURCE.ORG, INC.

Defendant.

CIVIL ACTION NO. 1:15-CV-02594-MHC

JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED CONSOLIDATED PRETRIAL ORDER

Plaintiff and Counterclaim-Defendant the Code Revision Commission, on behalf of and for the benefit of the General Assembly of Georgia, and the State of Georgia ("Commission"), and Defendant and Counterclaim-Plaintiff

Public.Resource.Org, Inc. ("Public Resource") jointly move for the Court to extend the deadline for filing the proposed consolidated pretrial order to thirty (30) days after the Court rules on the parties' summary judgment motions. Currently, LR

16.4 requires filing of the proposed order by April 18, 2016, yet the deadline for filing summary judgment motions under this Court's Scheduling Order (Dkt. 013)

is not until May 17, 2016. Both parties intend to file motions for summary judgment on or before the deadline of May 17, 2016.

Respectfully submitted, this 14th day of April, 2016.

/s/Anthony B. Askew/

Anthony B. Askew (G.A. Bar: 025300) Lisa C. Pavento (G.A. Bar: 246698) Warren J. Thomas (G.A. Bar: 164714) Meunier Carlin & Curfman LLC 999 Peachtree Street, NE, Suite 1300 Atlanta, Georgia 30309

Phone: 404-645-7700 Fax: 404-645-7707 taskew@mcciplaw.com lpavento@mcciplaw.com wthomas@mcciplaw.com

/s/Elizabeth H. Rader (by express

<u>permission)/</u>

Elizabeth H. Rader (pro hac vice)

ALSTON & BIRD LLP

950 F Street, NW

Washington, DC 20004

Telephone: 202-239-3008

Fax: (202) 239-3333

elizabeth.rader@alston.com

Jason D. Rosenberg Georgia Bar No. 510855 Sarah Parker LaFantano ALSTON & BIRD LLP One Atlantic Center 1201 West Peachtree Street Atlanta, GA 30309-3424 Telephone 404-881-7461 Fax (404) 253-8861 jason.rosenberg@alston.com sarah.lafantano@alston.com

Counsel for the Plaintiff, Code Revision Commission on behalf of and for the benefit of the General Assembly of Georgia, and the State of Georgia Counsel for the Defendant, Public.Resource.Org

CERTIFICATE OF COMPLIANCE

I hereby certify that, pursuant to L.R. 5.1C and 7.1D of the Northern District of Georgia, the foregoing **MOTION FOR EXTENSION OF TIME TO FILE PROPOSED CONSOLIDATED PRETRIAL ORDER** complies with the font and point selections approved by the Court in L.R. 5.1C. The foregoing pleading was prepared on a computer using 14-point Times New Roman font.

/s/Anthony B. Askew/

Anthony B. Askew (G.A. Bar: 025300) Meunier Carlin & Curfman LLC 999 Peachtree Street NE, Suite 1300 Atlanta, Georgia 30309 Telephone: 404-645-7700

Email: taskew@mcciplaw.com

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on April 14, 2016, a true and correct copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE PROPOSED CONSOLIDATED PRETRIAL ORDER was electronically filed with Clerk of Court using the CM/ECF system which will automatically send notification of such filing to all attorneys of record.

/s/Anthony B. Askew/

Anthony B. Askew (G.A. Bar: 025300) Meunier Carlin & Curfman LLC 999 Peachtree Street NE, Suite 1300 Atlanta, Georgia 30309

Telephone: 404-645-7700 Email: taskew@mcciplaw.com