

Rebekah A. Phelps-Davis  
 Pro Se Defendant  
 1216 Cambridge  
 Topeka, KS 66604  
 785.845.5938  
 785.233.0766 - fax  
 &

Shirley L. Phelps-Roper  
 Pro Se Defendant  
 3640 Churchill Road  
 Topeka, KS 66604  
 785.640.6334  
 785.233.0766 - fax  
[beshsncs.@cox.net](mailto:beshsncs.@cox.net)

FILED ENTERED  
 LODGED RECEIVED

APR 16 2007

AT BALTIMORE  
 CLERK U.S. DISTRICT COURT  
 DISTRICT OF MARYLAND

BY

DEPUTY

IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF MARYLAND – BALTIMORE DIVISION

ALBERT SNYDER,

Plaintiff,

vs.

Case No. 1:06-cv-1389-RDB

FRED W. PHELPS, SR.;  
 SHIRLEY L. PHELPS-ROPER;  
 REBEKAH A. PHELPS-DAVIS; and,  
 WESTBORO BAPTIST CHURCH, INC.

**MEMORANDUM IN SUPPORT OF**  
**MOTION FOR ADDITIONAL TIME**  
**TO FILE MOTIONS TO DISMISS**  
**AND FOR OTHER APPROPRIATE RELIEF**  
**PRIOR TO FILING AN ANSWER**

Rebekah A. Phelps-Davis and Shirley L. Phelps-Roper, as pro se defendants herein, hereby jointly move the Court for additional time, to and including **May 7, 2007**, within which

to file motions to dismiss or for other appropriate relief, prior to answering herein. In support hereof, defendants show the Court the following:

1. Defendants Phelps-Davis and Phelps-Roper were served with Summons and Complaint in this matter on March 26, 2007.
2. Defendants are working on motions for relief pursuant to Rule 12(b)(6), and researching other issues to be addressed, including possible motions to strike and/or for more definite statement, all pertaining to the Complaint herein. Defendants also file a Motion for Stay of Discovery simultaneous with this motion.
3. Defendants reasonably require a short extension of time to complete this work and submit these motions. Should the Court overrule the motions, defendants would thereafter proceed with filing an Answer as directed by the Court and rules of the Court. Defendants anticipate having the work completed on or before May 7, 2007, for filing with the Court.
4. Pursuant to Rule 105.9 of the local rules of this Court, plaintiff's counsels' position regarding this requested extension is that they do not concur in this request given defendants' prior knowledge of the lawsuit. Defendants would show the Court in this regard that neither of these defendants has had any role in this pending litigation that pertained to or required researching and briefing the legal issues related to the defense of this case until they were served herein. It is

defendants' intent to be expeditious in this matter, and to move through the issues in their research and writing as quickly as possible and file their motions on or before the May 7 time period requested. In the experience defendants have had it is not unusual for parties or counsel to require some time to get up to speed when they are new to a lawsuit, given that life, family (Mrs. Phelps-Roper has nine of her eleven children at home, Mrs. Phelps-Davis four) and professional activities are already under way. Further, the issues to be raised – as addressed in somewhat more detail in the motion for stay – are substantial in defendants' view, and deserve thorough attention.

5. A proposed Order is submitted herewith.

WHEREFORE, defendants Rebekah A. Phelps-Davis and Shirley L. Phelps-Roper request that the Court enter its order allowing them additional time, to and including **May 7, 2007**, to file motions to dismiss and for other appropriate relief prior to answering herein.

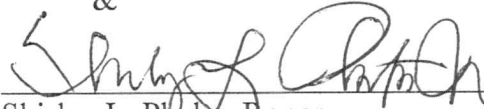
Respectfully submitted,



---

Rebekah A. Phelps-Davis  
Pro Se Defendant  
1216 Cambridge  
Topeka, KS 66604  
785.845.5938  
785.233.0766 – fax  
[beshsncs@cox.net](mailto:beshsncs@cox.net)

&



---

Shirley L. Phelps-Roper  
Pro Se Defendant  
3640 Churchill Road  
Topeka, KS 66604  
785.640.6334  
785.233.0766 - fax  
[beshsncs.@cox.net](mailto:beshsncs.@cox.net)

**CERTIFICATE OF SERVICE**

We hereby certify that the foregoing Memorandum in Support of Motion for Additional Time to File Motions to Dismiss And for Other Appropriate Relief Prior to Filing An Answer was served on April 12, 2007, as follows:

Original + 2 copies, with 2-hole punch, by regular mail, with proposed original order attached, with return envelope, to:

U S District Court Clerk  
101 W. Lombard Street, 4<sup>th</sup> Floor  
Baltimore, MD 21201

Copy to:

Mr. Sean Summer, Esq.

.pdf copy by e-mail to [ssummers@barley.com](mailto:ssummers@barley.com)

Mr. Craig Trebilcock, Esq.

.pdf copy by e-mail to [trebilcock@shumarkerwilliams.com](mailto:trebilcock@shumarkerwilliams.com)

Mr. Jon Katz, Esq.

.pdf copy by e-mail to [jon@markskatz.com](mailto:jon@markskatz.com)

Copy by regular mail to:

Mr. Sean E. Summers, Esq.

Mr. Paul W. Minnich, Esq.

Mr. Rees Griffiths, Esq.

Barley Snyder LLC

100 E Market St

PO Box 15012

York, PA 17401

Mr. Craig Tod Trebilcock, Esq.

Shumaker Williams PC

135 N George St Ste 201

York PA 17401

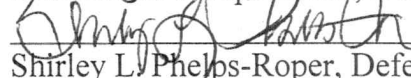
Mr. Jonathan L. Katz, Esq.

1400 Spring St., Suite 410

Silver Spring, MD 20910



Rebekah A. Phelps-Davis, Defendant Pro Se



Shirley L. Phelps-Roper, Defendant Pro Se