UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION

LINCOLN MEMORIAL UNIVERSITY DUNCAN SCHOOL OF LAW,)	
Plaintiff,)	
v.) Case No.	3:11-CV-608
THE AMERICAN BAR ASSOCIATION,)	(Varlan/Shirley)
Defendant.)	

MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Comes now the defendant, The American Bar Association ("ABA"), by and through counsel, and respectfully moves this Honorable Court for an additional twenty-one (21) days beyond the deadline of January 18, 2012, up to and including February 8, 2012, to respond to plaintiff's Complaint. As grounds for this Motion, the defendant relies upon the contemporaneously filed Memorandum.

WHEREFORE, the defendant respectfully requests that the Court grant an extension of time to respond to the plaintiff's Complaint.

Respectfully submitted, this 4th day of January, 2012.

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th Day of January, 2012, I caused to be filed electronically a copy of the foregoing pleading. The Court's electronic filing system will send notice of this filing to all parties indicated on the electronic filing receipt. I will cause all other parties to be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/ P. Alexander Vogel

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