

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION**

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

**MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF’S COMPLAINT**

The American Bar Association (“ABA”), by and through counsel, 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.

For cause, the defendant would show to the court that the plaintiff’s Verified Complaint (Doc. 1) contains one hundred and twenty-six (126) allegations, comprising of nearly forty (40) pages. Said Complaint was filed in the midst of the holiday season. Further, the defendant would show that it has the plaintiff’s Motion for Temporary Restraining Order (Doc. 2) pending for which it has spent considerable time and effort responding to same. The Motion for Temporary Restraining Order is set for hearing this Friday, January 6, 2012. Finally, counsel for the defendant contacted counsel for the plaintiff requesting that the parties enter into a stipulation of the twenty-one (21) day extension, pursuant to Local Rule 12.1, but plaintiff’s counsel declined to agree.

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

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

s/ P. Alexander Vogel

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HOWARD H. VOGEL, BPR NO. 1015  
JEFFREY R. THOMPSON, BPR NO. 20310  
P. ALEXANDER VOGEL, BPR NO. 23944  
**O'NEIL, PARKER & WILLIAMSON, PLLC**  
7610 Gleason Drive, Suite 200  
Knoxville, Tennessee 37919  
(865) 546-7190 (telephone)  
(865) 546-0789 (facsimile)  
[hvogel@opw.com](mailto:hvogel@opw.com)  
[jthompson@opw.com](mailto:jthompson@opw.com)  
[avogel@opw.com](mailto:avogel@opw.com)

Patricia J. Larson  
Stephanie Giggetts  
**AMERICAN BAR ASSOCIATION**  
321 North Clark Street  
Chicago, Illinois 60654  
(312) 988-5000

Anne E. Rea  
Michael P. Doss  
Linda R. Friedlieb  
**SIDLEY AUSTIN, LLP**  
One South Dearborn Street  
Chicago, Illinois 60603  
(312) 853-7000

*Attorneys for the Defendant The American Bar  
Association*

**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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HOWARD H. VOGEL, BPR NO. 1015  
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**O'NEIL, PARKER & WILLIAMSON, PLLC**  
7610 Gleason Drive, Suite 200  
Knoxville, Tennessee 37919  
(865) 546-7190 (telephone)  
(865) 546-0789 (facsimile)  
[hvogel@opw.com](mailto:hvogel@opw.com)  
[jthompson@opw.com](mailto:jthompson@opw.com)  
[avogel@opw.com](mailto:avogel@opw.com)