

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

LOUIE GOHMERT, TYLER BOWYER,
NANCY COTTLE, JAKE HOFFMAN,
ANTHONY KERN, JAMES R. LAMON,
SAM MOORHEAD, ROBERT
MONTGOMERY, LORAINÉ
PELLEGRINO, GREG SAFSTEN, KELLI
WARD and MICHAEL WARD,

Plaintiffs,

v.

THE HONORABLE MICHAEL R. PENCE,
VICE PRESIDENT OF THE UNITED
STATES, IN HIS OFFICIAL CAPACITY.

Defendant,

MICHELE LUNDGREN, MARIAN
SHERIDAN, MESHAWN MADDOCK,
MARI-ANN HENRY, AND
AMY FACCHINELLO, IN THEIR
OFFICIAL CAPACITY AS
PRESIDENTIAL ELECTORS,
REPRESENTING THEIR RESPECTIVE
STATES.

Intervenors.

Civil Action No.
6:20-cv-00660-JDK

**INTERVENORS' MICHELE
LUNDGREN ET.AL.'S
UNOPPOSED MOTION TO
FOR EXTENSION OF TIME**

(Election Matter)

**INTERVENORS' MICHELE LUNDGREN ET.AL.'S UNOPPOSED
MOTION TO EXTEND TIME TO FILE BRIEF**

TO THE HONORABLE COURT:

Michele Lundgren, Marian Sheridan, Meshawn Maddock Mari-Ann Henry and Amy Facchinello in their official capacities as Presidential Electors for the State of Michigan (hereinafter referred to as the “Michigan Electors” or “Intervenors”) move the Court, to grant Intervenors an extension of time to file their brief which was due on January 1, 2021 at 9 AM Central standard Time, and say:

I. INTRODUCTION

The briefing deadline for the filing of briefs in response to Defendant’s brief -- filed December 31, 2020 and the other briefs of the other parties supporting the position of Defendant -- was January 1, 2021 at 9 AM, Central Standard Time. Intervenors may adopt the brief of Plaintiffs with or without any additions and Intervenors were prepared to immediately review and decide whether or not to adopt Plaintiffs’ briefing positions and arguments. However, Plaintiffs were unable to complete their briefing due to technical difficulties and requested an extension of time from the Court.

Intervenors request an extension of time to file their brief no later than 15 minutes after Plaintiffs file their brief.

For these reasons, Intervenors pray that the Court grant this request for extension of time.

Respectfully submitted,

By: /s/ Charles Bundren

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CERTIFICATE OF ELECTRONIC FILING

The undersigned hereby certifies that this document has been filed by electronic means through the court's CM/ECF electronic filing system on the date indicated below.

CERTIFICATE OF SERVICE UNDER LOCAL RULE

Pursuant to LOCAL RULE CV-5 (c)&(d) of the Local Civil Rules of the United States District Court for the Eastern District of Texas, Notice of Electronic Filing of this document automatically generated by this Court's CM/ECF system constitutes service of this document under Federal Rule of Civil Procedure 5(b)(2)(E) and is sufficient service by serving the parties indicated below.

CERTIFICATE OF SERVICE

This is to certify that on this 1st day of January 2020 a true and correct copy of the foregoing document was served in accordance with the Federal Rules of Civil Procedure and the United States District Court for the Eastern District of Texas Local Rules on all legal counsel of record for any party and all pro se parties by serving the following:

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 x by the Court's CM/ECF Pacer electronic filing System pursuant to FRCP 5(b)(2)(E) and 5(b)(3), and LOCAL RULE CV-5 (c)&(d),

 by certified mail return receipt requested deposited with the United States Postal Service on the date indicated above pursuant to FRCP 5(b)(2)(C),

 by email at the email address indicated above pursuant to FRCP 5(b)(2)(E), and/or

_____ by hand delivery service on the date indicated above pursuant to FRCP 5(b)(2)(A) and (B).

By: /s/ Charles Bundren
BUNDREN LAW GROUP, PLLC
Wm. Charles Bundren, Esq.
ATTORNEY FOR INTERVENORS:

CERTIFICATE OF CONFERENCE

Intervenors' Counsel has complied with the meet and confer requirements in LOCAL RULE CV-7(h). Intervenors counsel, Mr. Bundren, conferred by personal telephone call with Lewis Sessions, Esq. on January 1, 2021, counsel for Plaintiffs and Plaintiffs do not oppose Intervenors motion.

For Defendant, the personal conference required by LOCAL RULE CV-7(h) was conducted on January 21, 2021 with John Coughlan, Esq., Counsel for Defendant. Mr. Coughlan stated that Defendant does not oppose Intervenors' motion.

By: /s/ Charles Bundren
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ATTORNEY FOR INTERVENORS: