

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
FLORIDA**

Tallahassee Division

NEW FLORIDA MAJORITY
EDUCATION FUND, COMMON CAUSE
and MI FAMILIA VOTA EDUCATION
FUND,

Plaintiffs,

Civil Action No. 4:18-cv-00466 MW-CAS

v.

KEN DETZNER, in his official
capacity as Secretary of State of the
State of Florida,

Defendant.

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S MOTION TO DISMISS**

Plaintiffs New Florida Majority Education Fund, Common Cause, and Mi Familia Vota Education Fund (hereinafter Plaintiffs), by and through undersigned counsel, move to extend the time to file their response to Defendant's motion to dismiss and, in support thereof, state as follows:

1. Plaintiffs filed their Complaint on October 10, 2018. [Docket Entry (DE) 1].
2. Defendant, Florida Secretary of State Ken Detzner, filed his Motion to Dismiss the case on November 5, 2018. [DE 13].
3. Plaintiffs' response to Defendant's motion is due on November 19, 2018.
4. Due to litigation deadlines in other cases, including emergency filings in litigation related to the 2018 mid-term elections, Plaintiffs' counsel need more time to prepare the response.
5. Accordingly, Plaintiffs request a ten-day extension of time to file their response.
6. Plaintiffs' counsel contacted Defendant's counsel by email the evening of November 15th,

and left a phone message the morning of November 16th, inquiring as to whether Defendant will oppose this motion. Defendant's counsel has not yet responded.

7. Plaintiffs make this request in good faith and not for any improper purpose or to cause undue delay.

WHEREFORE, Plaintiffs respectfully ask this court to extend the deadline for filing their response to Defendant's motion to dismiss to November 29, 2018, and attach a proposed order to that effect for the Court's convenience.

Dated: November 16, 2018

Respectfully submitted,

/s/ Nancy G. Abudu

Nancy G. Abudu (Fla. Bar No. 111881)

nabudu@aclufl.org

ACLU Foundation of Florida, Inc.

4343 W. Flagler Street, Suite 400

Miami FL 33134

Tel: 786-363-2700

Julie A. Ebenstein (Fla. Bar No. 91033)

jebenstein@aclu.org

American Civil Liberties Union Foundation

125 Broad Street

New York, NY 10004

Tel: 212-549-2500

Ezra D. Rosenberg (**pro hac vice – to be filed*)

Julie Houk (**pro hac vice – to be filed*)

Lawyers' Committee for Civil Rights Under Law

1500 K Street NW, Suite 900

Washington, D.C. 20005

Telephone: (202) 662-8600

Facsimile: (202) 783-0857

erosenberg@lawyerscommittee.org

jhouk@lawyerscommittee.org

Donita Judge (**pro hac vice – to be filed*)

Denise Lieberman (**pro hac vice – to be filed*)

Gilda Daniels (**pro hac vice – to be filed*)

ADVANCEMENT PROJECT

1220 L Street NW, Suite 850
Washington DC 20005
Ph: (202) 728-9557
Fax: (202) 728-9558
djudge@advancementproject.org
dlieberman@advancementproject.org
gdaniels@advancementproject.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2018, I electronically filed the foregoing document with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties.

/s/ Nancy G. Abudu
Nancy G. Abudu