IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

BILLIE FAYE KEYES, et al.

PLAINTIFFS

V.

CIVIL ACTION NO. 3:16cv228 CWR-LRA

PHILIP GUNN, et al.

DEFENDANTS

JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFFS' COMPLAINT

Plaintiffs Billie Faye Keyes, Joshua Allen, Courtney Rena Fortune, Karli Ford Matthews and Shelton S. Matthews and Defendants Phillip Gunn, Mark Baker, Richard Bennett, Charles Jim Beckett, Bill Denny, and The Mississippi House of Representatives, by and through counsel, respectfully move this court for an extension of Defendants time to file a response to Plaintiffs' Complaint [ECF # 1]. In support of this Motion, the parties would show as follows:

- 1. Plaintiffs' Complaint was filed on March 30, 2016. On April 7, 2016, counsel for Defendants accepted service of process on Defendants' behalf. By operation of Fed. R. Civ. P. 12(a)(1)(i), Defendants have twenty-one (21) days, until April 28, 2016, to serve a response to Plaintiffs' Complaint.
- 2. Counsel for Plaintiffs and Defendants have conferred and agreed that Defendants should have until May 23, 2016, to serve a response to Plaintiffs' Complaint.
- 3. Accordingly, the parties hereby request that the Court enter its Order allowing Defendants until May 23, 2016, to serve a response to Plaintiff's Complaint.

WHEREFORE, Plaintiffs Billie Faye Keyes, Joshua Allen, Courtney Rena Fortune, Karli Ford Matthews and Shelton S. Matthews and Defendants Phillip Gunn, Mark Baker, Richard Bennett, Charles Jim Beckett, Bill Denny, and The Mississippi House of Representatives do

hereby respectfully request that the Court enter its Order allowing Defendants until May 23, 2016, to file a response to Plaintiffs' Complaint.

This 20th day of April, 2016.

Respectfully submitted,

BY: <u>s/Michael B. Wallace</u>

MICHAEL B. WALLACE (MSB #6904) WISE CARTER CHILD & CARAWAY, P.A.

Post Office Box 651

Jackson, Mississippi 39205-0651

Telephone: 601-968-5534

Fax: 601-944-7738 mbw@wisecarter.com

ATTORNEY FOR DEFENDANTS

s/John Corlew (w/ permission)

JOHN CORLEW (MSB #6526)

CORLEW MUNFORD & SMITH PLLC

4450 Old Canton Road; Suite 111 (39211)

Post Office Box 16807

Jackson, Mississippi 39236-6807

Telephone: 601-366-1106 Facsimilie: 601-366-1052 jcorlew@cmslawyers.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I Michael B. Wallace hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following:

John G. Corlew CORLEW MUNFORD & SMITH, PLLC P. O. Box 16807 Jackson, MS 39236-6807 jcorlew@cmslawyers.com

This the 20th day of April, 2016.

s/Michael B. Wallace MICHAEL B. WALLACE