## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

BILLIE FAYE KEYES, JOSHUA ALLEN, COURTNEY RENA FORTUNE, KARLI FORD MATTHEWS AND SHELTON S. MATTHEWS

**PLAINTIFFS** 

V. CIVIL A

CIVIL ACTION NO. 3:16cv228-CWR-LRA

PHILIP GUNN, ET AL

**DEFENDANT** 

## UNOPPOSED MOTION FOR ADDITIONAL TIME TO RESPOND TO MOTIONS TO DISMISS

COME NOW Plaintiffs and file this unopposed motion for additional time to file replies to three pending Motions to Dismiss and set response date for Defendants' rebuttal memoranda and would show unto the Court as follows:

- 1. On May 10, 2016 the Defendants responded to Plaintiffs' Complaint by filing three separate Motions to Dismiss: (1) Motion to Dismiss for Lack of Jurisdiction (ECF # 4); (2) Motion to Dismiss for Failure to State a Claim on the Basis of Immunity (ECF # 6); and (3) Motion to Dismiss for Failure to State a Claim (ECF # 8).
- 2. The Plaintiffs seek to secure 12 additional days to respond to these three motions. Counsel for Plaintiffs and Defendants have conferred and Defendants do not oppose Plaintiffs' request for additional time to respond to each of the three motions until June 27, 2016;
- 3. Plaintiffs and Defendants also agree that Defendants shall have 12 additional days until July 25, 2016 to file any rebuttal memoranda in support of the

motions to dismiss.

WHEREFORE, Plaintiffs move for additional time to respond to the Defendants' Motions to Dismiss until June 27, 2016, and that Defendants be allowed until July 25, 2016 to file rebuttal memoranda in support of their motions.

DATED: June 10, 2016.

Respectfully submitted,

BILLIE FAYE KEYES, JOSHUA ALLEN, COURTNEY RENA FORTUNE, KARLI FORD MATTHEWS AND SHELTON S. MATTHEWS

BY: <u>/s/ John G. Corlew</u>
JOHN G. CORLEW

John G. Corlew (MSB # 6526) CORLEW MUNFORD & SMITH PLLC 4450 Old Canton Road; Suite 111 (39211) Post Office Box 16807 Jackson, MS 39236-6807 Telephone: 601-366-1106

Facsimile: 601-366-1052 jcorlew@cmslawyers.com

## **CERTIFICATE OF SERVICE**

I, John G. Corlew, hereby certify that I electronically filed the foregoing with the Clerk of Court using the ECF system which will automatically send email notification of such filing to the following:

Michael B. Wallace mbw@wisecarter.com

DATED: June 10, 2016.

/s/ John G. Corlew JOHN G. CORLEW