

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

TIMOTHY KING, MARIAN SHERIDAN,
JOHN HAGGARD, CHARLES RITCHARD,
JAMES HOOPER, DAREN RUBINGH,

Case No. 20-CV-13134
Hon. Linda V. Parker

Plaintiffs,

v.

GRETCHEN WHITMER, in her official
capacity as the Governor of the State of
Michigan, JOCELYN BENSON, in her
official capacity as Michigan Secretary of
State and the Michigan BOARD OF STATE
CANVASSERS,

Defendants.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO INTERVENOR
DEFENDANT ROBERT DAVIS' MOTION FOR SANCTIONS TO BE ASSESSED
AGAINST PLAINTIFFS AND PLAINTIFFS' COUNSEL PURSUANT TO THE
COURTS INHERENT AUTHORITY AND 28 U.S.C. §1927**

Now comes the Plaintiffs by and through counsel, pursuant to Rule 6(b)(A) and move this Court for an order to extend time to file a response to Intervenor Defendant's Motion for Sanctions, and move this Court for an order to extend time from January 5, 2021 to January 19, 2021. In support hereof, Plaintiffs state the following:

1. The time for filing the Response to Intervenor Defendant's Motion for Sanctions has not expired.
2. This motion is not being made for the purpose of delay, but is made based upon current assignments and the need for more time to prepare a response.

3. No party will be prejudiced by the delay, as it will not delay the litigation, which is still in its early stages. Indeed, the oppositions to motions to dismiss are not even due. There have not been any previous requests for extension regarding this motion.
4. Plaintiffs' Petition for a Writ of Certiorari, Case No. 20-2205, is currently pending before the United States Supreme Court and responses are due by January 14, 2021.
5. Andrew A. Paterson, Jr., counsel for Intervenor Defendant Robert Davis, has been contacted, and Mr. Davis does not consent to an extension of time for Plaintiffs to respond to Intervenor Defendant's Motion for Sanctions. (Exhibit 1).

Therefore, Plaintiffs respectfully request the Court for an order extending the time to file a response to January 19, 2021.

Respectfully submitted,

/s/ Stefanie Lambert Junttila
STEFANIE LAMBERT JUNTILA (P71303)
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Detroit, MI 48226
(313) 963-4740
attorneystefanielambert@gmail.com

Certificate of Service

I, Stefanie Lambert Junttila, attorney at law, certify that on January 3, 2021, I caused a copy of this pleading to be served upon the Clerk of the Court and Intervenor-Defendant via E-file.

/s/ Stefanie Lambert Junttila
Stefanie Lambert Junttila (P71303)

From: Drew Paterson aap43@outlook.com
Subject: Re: King et al v. Whitmer et al
Date: January 2, 2021 at 6:56 PM
To: Stefanie Lambert attorneystefanielambert@gmail.com



Counsel,
Respectfully, my client does NOT consent or concur with an extension.

Drew Paterson
(248) 568-9712
aap43@outlook.com

From: Stefanie Lambert <attorneystefanielambert@gmail.com>
Sent: Saturday, January 2, 2021 4:37 PM
To: aap43@hotmail.com <aap43@hotmail.com>
Subject: King et al v. Whitmer et al

Counsel:

As you know, our response to the Motion for Sanctions is due on Tuesday. Because our petition for a writ of certiorari is currently pending before the Supreme Court of the United States and because of the pending motions to dismiss, we are requesting an extension to respond to the motion until January 19, 2021. Please let me know if you will agree to that extension and we will prepare a consent motion.

Sincerely,

Stefanie Lambert Junttila