

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**PLANNED PARENTHOOD  
CENTER FOR CHOICE et al**  
*Plaintiffs,*

**v.**

**GREG ABBOTT, et al.**  
*Defendants.*

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**Case No: 1:20-CV-00323-LY**

**DEFENDANT KIM OGG'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSE**

Defendant Kim Ogg, Harris County District Attorney, files this Unopposed Motion for Extension of Time to file a Response to Plaintiffs' Second Amended Complaint for Injunctive and Declaratory Relief.

Plaintiffs filed their Complaint for Injunctive and Declaratory Relief on March 25, 2020 (Doc. 1), their Amended Complaint for Injunctive and Declaratory Relief on April 13, 2020 (Doc. 67), and their Second Amended Complaint for Injunctive and Declaratory Relief on April 17, 2020 (Doc. 86). Counsel for Kim Ogg agreed to waive service on April 1, 2020 (Doc. 48). Pursuant to Fed. R. Civ. P. 12, Kim Ogg's Response to Plaintiffs' live Complaint is due on June 1, 2020.

Kim Ogg respectfully requests that the Court grant a 30-day extension of time to file her Response to Plaintiffs' Second Amended Complaint. This extension is necessary to provide Kim Ogg sufficient time to respond to the arguments set forth in Plaintiffs' Second Amended Complaint. Counsel for Kim Ogg has conferred with Plaintiffs' counsel regarding the relief requested in the Motion and Plaintiffs do not oppose this extension.

**CONCLUSION**

For the foregoing reasons, the Court should grant Defendant Kim Ogg's motion for extension of time for her Response, up to and including July 1, 2020.

Date: **May 27, 2020**

Respectfully submitted,

OF COUNSEL:

VINCE RYAN  
HARRIS COUNTY ATTORNEY

/s/ **Laura Beckman Hedge**  
LAURA BECKMAN HEDGE  
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**ATTORNEY FOR DEFENDANT  
KIM OGG**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on May 19, 2020, counsel for Plaintiffs notified all Defendants that they were agreeable to a 30-day extension of time for Defendants to file their Response to the live Complaint. On May 20, 2020 I verified this extension with Plaintiffs' counsel Julie Murray via email that this extension was likewise granted to Kim Ogg.

/s/ **Laura Beckman Hedge**  
LAURA BECKMAN HEDGE  
Sr. Assistant County Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on **May 27, 2020** a true and correct copy of the foregoing document was served electronically via the Court's electronic filing system on all parties of record:

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**/s/ Laura Beckman Hedge**  
Laura Beckman Hedge  
Sr. Assistant County Attorney

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**ORDER GRANTING UNOPPOSED MOTION FOR EXTENSION**

On this date, the Court considered Defendant Kim Ogg's Unopposed Motion for Extension of Time to File Response. After considering the motion, the Court is of the opinion that the motion should be and is hereby GRANTED.

IT IS THEREFORE ORDERED that Defendant Kim Ogg's Unopposed Motion for Extension of Time to File Response is GRANTED.

Defendant Kim Ogg shall file her response to Plaintiffs' Second Amended Complaint for Injunctive and Declaratory Relief by July 1, 2020.

SIGNED on this the \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
LEE YEAKEL  
UNITED STATES DISTRICT JUDGE