

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

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

**Plaintiffs**

**v.**

**GREG ABBOTT, et al.**

**Defendants.**

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**Civil Action No. 1:20-cv-00323-LY**

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**DEFENDANT MARGARET MOORE’S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSE TO PLAINTIFFS’ SECOND AMENDED COMPLAINT  
FOR INJUNCTIVE AND DECLARATORY RELIEF**

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TO THE HONORABLE JUDGE LEE YEAKEL:

COMES NOW Defendant Travis County District Attorney Margaret Moore and files this Unopposed Motion for Extension of Time to File Response to Plaintiffs’ Second Amended Complaint (ECF No.86) and in support thereof state as follows:

Plaintiffs filed their Complaint for Injunctive and Declaratory Relief on March 25, 2020 (ECF No. 1). Counsel for Defendant Moore agreed to waive service on March 25, 2020 (ECF No. 48). Plaintiffs subsequently filed their First Amended Complaint on April 13, 2020, (ECF No. 67) and Second Amended Complaint on April 17, 2020 (ECF No. 86). Pursuant to Fed. R. Civ. P. 12, Defendant Moore’s Response to Plaintiffs’ Complaint is due on May 26, 2020.

Defendant Moore 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 Defendant Moore sufficient time to respond to the arguments set forth in Plaintiffs’

Second Amended Complaint in light of the current status of the subject Governor's Orders. Counsel for Defendant Moore 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 Moore's motion for extension of time for her Response, up to and including June 25, 2020.

Respectfully submitted,

**DAVID A. ESCAMILLA**  
**TRAVIS COUNTY ATTORNEY**  
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/s/ Leslie W. Dippel  
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**ATTORNEYS FOR DEFENDANT TRAVIS**  
**COUNTY DISTRICT ATTORNEY,**  
**MARGARET MOORE**

**CERTIFICATE OF SERVICE**

I certify that on May 22, 2020, a copy of Defendant Moore's Unopposed Motion for Extension of Time to File Response to Plaintiffs' Second Amended Complaint for Injunctive and Declaratory Relief was electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on each attorney who has made an appearance in this case.

/s/ Leslie W. Dippel  
Leslie W. Dippel  
Assistant County Attorney

**CERTIFICATE OF CONFERENCE**

I certify that on May 19, 2020, counsel for Defendant Moore conferred with Plaintiffs' counsel, regarding the filing of Defendant Moore's Unopposed Motion for Extension of Time to File Response to Plaintiffs' Second Amended Complaint. Counsel for Plaintiffs indicated she is UNOPPOSED to Defendants Motion for Extension of Time.

/s/ Leslie W. Dippel  
Leslie W. Dippel  
Assistant County Attorney

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**Civil Action No. 1:20-cv-00323-LY**

**ORDER**

Before the Court is Defendant Travis County District Attorney Margaret Moore's Unopposed Motion for Extension of Time to File a Response to Plaintiffs' Second Amended Complaint for Injunctive and Declaratory Relief. After careful consideration of the Motion, Plaintiffs' response, if any, and the pleadings filed by the parties, the Court is of the opinion that the Motion has merit and should be GRANTED.

Accordingly, it is ORDERED that Defendant Margaret Moore shall file a response to Plaintiffs' Second Amended Complaint on or before June 25, 2020.

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

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE