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

| PLANNED PARENTHOOD | | § | |
|--------------------------------|-------------|----------|---------------------------|
| CENTER FOR CHOICE et al | | § | |
| | Plaintiffs, | § | |
| v. | | § | Case No: 1:20-CV-00323-LY |
| | | § | |
| GREG ABBOTT, et al | | § | |
| | Defendants. | § | |

<u>DEFENDANT RICARDO RODRIGUEZ, JR.'S UNOPPOSED MOTION FOR</u> <u>EXTENSION OF TIME TO FILE RESPONSE</u>

Defendant Ricardo Rodriguez, Jr., Hidalgo County Criminal 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 17, 2020 (Doc. 86). Counsel for Ricardo Rodriguez, Jr. agreed to waive service on March 30, 2020 (Doc. 48). Pursuant to Fed. R. Civ. P. 12, Ricardo Rodriguez, Jr.'s Response to Plaintiffs' live Complaint is due on May 29, 2020.

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

For the reasons above, Defendant Ricardo Rodriguez, Jr. requests that the Court enter an order granting him an extension of time, up to and including June 29, 2020, to file a response to Plaintiffs' Second Amended Complaint.

Respectfully submitted,

RICARDO RODRIGUEZ, JR. CRIMINAL DISTRICT ATTORNEY HIDALGO COUNTY, TEXAS

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ATTORNEY FOR DEFENDANT RICARDO RODRIGUEZ, JR

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.

/s/ Josephine Ramirez-Solis
Josephine Ramirez Solis
Assistant District Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2020, this document was served through the Court's CM/ECF Document Filing System upon the following counsel of record:

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| | Defendants. | § | |

ORDER GRANTING DEFENDANT RICARDO RODRIGUEZ, JR.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

Before the Court is Defendant Hidalgo County Criminal District Attorney Ricardo Rodriguez, Jr.'s Unopposed Motion for Extension of Time to File a Response to Plaintiffs' Second Amended Complaint. After careful consideration of the Motion and the record, the Court is of the opinion that the Motion has merit and should be GRANTED.

Accordingly, it is ORDERED that Defendant Hidalgo County Criminal District Attorney Ricardo Rodriguez Jr. shall file a Response to Plaintiffs' Second Amended Complaint on or before June 29, 2020.

| SIGNED this | day of | , 2020 |
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| | | |
| UNITED STATES | DISTRICT JUD | GE |