

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 06-21265-CIV-SEITZ/MCALILEY

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LEAGUE OF WOMEN VOTERS OF FLORIDA, PEOPLE	:
ACTING FOR COMMUNITY TOGETHER (PACT),	:
FLORIDA AFL-CIO, AMERICAN FEDERATION OF STATE,	:
COUNTY AND MUNICIPAL EMPLOYEES, COUNCIL 79	:
(AFSCME), SEIU FLORIDA HEALTHCARE UNION, as	:
organizations and as representatives of their members; and	:
MARILYNN WILLS,	:
	:
Plaintiffs,	:
	:
v.	:
	:
KURT S. BROWNING, in his official capacity as Secretary of	:
State for the State of Florida, and DONALD PALMER, in his	:
official capacity as Director of the Division of Elections within	:
the Department of State for the State of Florida,	:
	:
Defendants.	:
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**CONSENT MOTION FOR AN EXTENSION OF TIME FOR PLAINTIFFS
TO FILE A REPLY IN SUPPORT OF THEIR MOTION FOR
ATTORNEYS' FEES AND COSTS**

Plaintiffs respectfully move this Court, with the consent of Defendants, for an Order extending the time for Plaintiffs to file and serve a reply in support of their motion for attorneys' fees and costs up to and including August 22, 2008, and state as follows:

1. On May 23, 2008, Plaintiffs filed a Consent Motion for Extension of Time for Plaintiffs to Move for Attorneys' Fees and Costs (Doc. No. 84), which respectfully requested an extension of time to file a motion for attorneys' fees and costs up to and including June 20, 2008; Defendants to file and serve a response to the motion up to and including July 25, 2008; and Plaintiffs to file and serve a reply up to and including August 22, 2008.

2. On May 25, 2008, the Court granted Plaintiffs until June 20, 2008, to file a motion for attorneys' fees and costs (Doc. No. 85), but did not expressly grant Defendants additional time to file and serve a response and Plaintiffs additional time to file and serve a reply.

3. On June 20, 2008, Plaintiffs filed Plaintiffs' Verified Motion For An Award of Attorneys' Fees and Costs and Incorporated Memorandum of Law and Request for Hearing. (Doc. No. 86.)

4. On June 27, 2008, Defendants filed a motion styled Consent Motion For Extension of Time to File Response To Motion for Fees and Costs (Doc. No. 87), requesting up to and including July 25, 2008, to file and serve a response to plaintiffs' motion for attorneys' fees and costs.

5. Plaintiffs' consent in their May 23, 2008 motion (Doc. No. 84) to extend Defendants' time to respond was based on Defendants' consent to extend Plaintiffs' time to reply up to and including August 22, 2008.

6. In accordance with S.D. Fla. L.R. 7.1.A.2, a proposed Order granting Plaintiffs' motion for an extension of time to file and serve a reply is attached hereto as Exhibit "A".

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order extending their time to file and serve a reply up to and including August 22, 2008.

Respectfully submitted this 30th day of June, 2008.

BECKER & POLIAKOFF, P.A.

By: /s Gary C. Rosen

Gary C. Rosen, Esq.
Florida Bar No. 310107
3111 Stirling Road
Ft. Lauderdale, Florida 33312
(954) 985-4133

Elizabeth S. Westfall
Advancement Project
1730 M Street, NW, Suite 910
Washington, DC 20036
(202) 728-9557

Eric A. Tirschwell
Craig L. Siegel
Amy Weiner
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, New York 10036
(212) 715-9100

Wendy R. Weiser
The Brennan Center for Justice
161 Avenue of the Americas, 12th Fl.
New York, New York 10013
(212) 998-6730

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 30, 2008, I caused to be electronically filed a true and correct copy of Consent Motion For An Extension of Time For Plaintiffs To File A Reply In Support of Their Motion For Attorneys' Fees and Costs and proposed order using CM/ECF. I also certify that the foregoing documents are being served this day on all counsel of record identified below by transmission of Notices of Electronic Filing generated by CM/ECF.

Peter Antonacci
pva@gray-robinson.com

Allen Winsor
awinsor@gray-robinson.com

GRAYROBINSON, PA
Post Office Box 11189
Tallahassee, Florida 32302-3189
Telephone: (850) 577B9090
Facsimile: (850) 577B3311

*Attorneys for Defendants
Kurt S. Browning and Donald L. Palmer, in their official capacities*

s/Gary C. Rosen
Gary C. Rosen