

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NORTH CAROLINA STATE CONFERENCE)  
OF THE NAACP, et al., )

Plaintiffs, )

v. )

**Case No.: 1:13-CV-658**

PATRICK LLOYD MCCRORY, in his official )  
capacity as the Governor of North Carolina, et )  
al., )

Defendants. )

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LEAGUE OF WOMEN VOTERS OF )  
NORTH CAROLINA, et al., )

Plaintiffs, )

v. )

**Case No.: 1:13-CV-660**

THE STATE OF NORTH CAROLINA, et al., )

Defendants. )

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UNITED STATES OF AMERICA, )

Plaintiffs, )

v. )

**Case No.: 1:13-CV-861**

THE STATE OF NORTH CAROLINA, et al, )

Defendants. )

**PLAINTIFFS' AND INTERVENORS' JOINT CONSENT MOTION  
TO EXTEND THE DEADLINE FOR FILING MOTIONS TO COMPEL**

Plaintiffs and Plaintiff-Intervenors (“Plaintiffs”) in the above-captioned cases, with the consent of Defendants, hereby move the Court pursuant to Fed. R. Civ. P. 6 and 16 for a two-week enlargement of the time period and an extension of the deadline (up to and including May 1, 2015) for any party to file a motion compel relative to certain discovery-related issues described with particularity hereinafter.

In support whereof, Plaintiffs show the Court as follows:

1. The parties, through counsel, have discussed certain discovery-related issues that are either in the process of being resolved or further discussed.
2. The parties wish to have more time to resolve those issues but not raise any new discovery issues (except to the extent that such issues relate to what is included or not included in any new production that a party or the North Carolina Department of Transportation (“DOT”) has agreed to make).
3. Defendants and certain Plaintiffs have agreed to produce or will soon be producing non-privileged documents responsive to outstanding requests for the production of documents.
4. The parties are requesting this extension to preserve their rights on discovery issues already raised and issues that relate to what is included or not included in any new production that a party or DOT has agreed to make, in the event they are not amicably resolved.

5. Plaintiffs believe that a two-week extension of time will provide them with sufficient time to address these issues and will neither delay the progress of this litigation nor prejudice any party.

6. Neither this motion nor the granting of the requested enlargement of time shall provide a basis for extending the trial date in this case.

7. Defendants consent to the relief that Plaintiffs request in this Motion.

WHEREFORE, Plaintiffs respectfully request a two-week enlargement of the time period and an extension of the deadline (up to and including May 1, 2015) for any party to file a motion to compel relative to the discovery-related issues described with particularity in this Motion. Plaintiffs are submitting a proposed order contemporaneously herewith.

Dated: April 17, 2015

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## CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing **PLAINTIFFS' AND INTERVENORS' JOINT CONSENT MOTION TO EXTEND THE DEADLINE FOR FILING MOTIONS TO COMPEL**, with service to be made by electronic filing with the Clerk of the Court using the CM/ECF System, which will send a Notice of Electronic Filing to all parties with an e-mail address of record, who have appeared and consent to electronic service in this action.

This the 17 day of April, 2015.

/s/ Edwin M. Speas, Jr.  
Edwin M. Speas, Jr.