

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI CIVIL DIVISION**

KARLA VANESSA ARCIA, an individual,  
MELANDE ANTOINE, an individual, VEYE  
YO, a civic organization based in Miami-  
Dade County, FLORIDA IMMIGRANT  
COALITION, INC., a Florida non-profit  
corporation, NATIONAL CONGRESS FOR  
PUERTO RICAN RIGHTS, a Pennsylvania  
non-profit corporation, FLORIDA NEW  
MAJORITY, INC., a Florida non-profit  
corporation, and 1199SEIU UNITED  
HEALTHCARE WORKERS EAST, a Labor  
Union,

Plaintiffs,

v.

KEN DETZNER, in his official capacity as  
Florida Secretary of State,

Defendant.

Case No. 1:12-cv-22282-WJZ  
Honorable Judge William J. Zloch

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE MOTION  
FOR ATTORNEYS' FEES AND EXPENSES**

Plaintiffs Karla Vanessa Arcia, *et al.* ("Plaintiffs"), with consent of Defendant Florida Secretary of State ("Defendant") hereby move for an extension of the date their motion for attorneys' fees is due. Under Local Rule 7.3(a), Plaintiffs' motion for attorney's fees is due to be filed 60 days after entry of judgment, or Monday, April 13, 2015. In accordance with Local Rule 7.3, Plaintiffs provided a draft motion to Defendant and Defendant provided objections. The parties have conferred as required and are continuing to negotiate in good faith consistent with Local Rule 7.3(b) regarding resolution of attorneys' fees. To facilitate resolution of these issues

without the need for the time and resources of this Court, Plaintiffs seek additional time to attempt to resolve issues by agreement between the parties. Plaintiffs believe that 30 days, until May 13, 2015, should be sufficient to facilitate these discussions. Plaintiffs have consulted with Defendant Florida Secretary of State, who has agreed to this motion.

Dated: April 10, 2015

Respectfully submitted,

/s Katherine Roberson-Young  
Katherine Roberson-Young, Esq.  
Florida Bar No. 038169  
3000 Biscayne Blvd., Suite 212  
Miami, Florida 33137  
(305) 571-4082  
(305) 571-1396 (fax)  
[katherine.roberson-young@seiu.org](mailto:katherine.roberson-young@seiu.org)

Catherine M. Flanagan  
Michelle Kanter Cohen  
**PROJECT VOTE**  
805 15<sup>th</sup> Street, N.W., Suite 250  
Washington, DC 20005  
(202) 546-4173  
(202) 733-4762 (fax)  
[cflanagan@projectvote.org](mailto:cflanagan@projectvote.org)  
[mkantercohen@projectvote.org](mailto:mkantercohen@projectvote.org)

John De Leon  
Florida Bar No. 650390  
**LAW OFFICES OF CHAVEZ & DE LEON**  
5975 Sunset Drive, Suite 605  
South Miami, FL 33143  
(305) 740-5347  
(305) 740-5348 (fax)  
[jdeleon@chavez-deleon.com](mailto:jdeleon@chavez-deleon.com)

Juan Cartagena  
Jose Perez, Esq.  
**LATINOJUSTICE PRLDEF**  
99 Hudson Street, 14th Floor  
New York, NY 10013-2815  
(212) 219-3360  
(212) 431-4276 (fax)  
[jcartagena@latinojustice.org](mailto:jcartagena@latinojustice.org)  
[jperez@latinojustice.org](mailto:jperez@latinojustice.org)

Marina K. Jenkins  
**JENNER & BLOCK, LLP**  
1099 New York Ave., N.W., Suite 900  
Washington, DC 20001-4412  
(202) 639-6000  
(202) 639-6066 (fax)  
[mjenkins@jenner.com](mailto:mjenkins@jenner.com)

Penda Hair  
Katherine Culliton-Gonzalez, Esq.  
**ADVANCEMENT PROJECT**  
1220 L Street, N.W., Suite 850  
Washington, D.C. 20005  
(202) 728-9557  
(202) 728-9558 (fax)  
pendahair@advancementproject.org  
kcullitongonzalez@advancementproject.org

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 10th day of April 2015, a true and correct copy of the foregoing Plaintiffs' Consent Motion For Extension Of Time To File Motion For Attorneys' Fees And Expenses\_was served on all counsel of record via CM/ECF.

April 10, 2015

By:

/s Katherine Roberson-Young  
Katherine Roberson-Young, Esq.  
Florida Bar No. 038169  
3000 Biscayne Blvd., Suite 212  
Miami, Florida 33137  
(305) 571-4082  
(305) 571-1396 (fax)  
katherine.roberson-young@seiu.org