

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SANDRA GARZA,

Plaintiff,

v.

DONALD J. TRUMP, et al.

Defendants.

Civil Case No. 1:23-cv-38-APM

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF SUPPORTING HIS MOTION TO DISMISS
PLAINTIFFS' COMPLAINT**

Defendant Donald J. Trump respectfully moves this Court to extend his deadline to file a reply in support of his motion to dismiss Plaintiffs' Complaint to and including May 9, 2023.

On April 3, 2023, President Trump filed his motion to dismiss and supporting memorandum. Dkt. Nos. 24, 24.1. Plaintiffs responded on April 25, 2023. Dkt. No. 25. According to local rules, the deadline for the Trump Defendants to file their reply is on May 2, 2023.

President Trump is seeking a seven-day extension to and including May 9, 2023. Good cause exists to grant the relief requested. Given the schedule and court commitments of counsel for President Trump, the extension will ensure that counsel has adequate time to review the briefing in this case and file a complete and concise reply. This is the first request for extension of time to file this reply brief. This extension will not prejudice any party, nor will it impede or delay the litigation in

this case. Notably, the other two defendants briefing schedules for their respective motions to dismiss will not be complete before May 9, 2023.

In accordance with Local Rule 7(m), President Trump's counsel has conferred with counsel for the Plaintiff regarding this requested extension of time. Plaintiff consents to the requested extension.

For the foregoing reasons, President Trump respectfully asks this Court to extend his time to file a reply in support of his motion to dismiss Plaintiff's Complaint to and including May 9, 2023.

Dated: April 30, 2023

Respectfully submitted,

/s/ Jesse R. Binnall
Jesse R. Binnall, VA022
THE BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
Tel: (703) 888-1943
Fax: (703) 888-1930
jesse@binnall.com

David A. Warrington
D.C. Bar No. 1616846
Jonathan M. Shaw
D.C. Bar No. 446249
Gary M. Lawkowski
D.C. Bar No. 1781747
DHILLON LAW GROUP, INC.
2121 Eisenhower Ave, Suite 402
Alexandria, Virginia 22314
Tel: (703) 574-1206
Fax: (415) 520-6593
dwarrington@dhillonlaw.com
jshaw@dhillonlaw.com
glawkowski@dhillonlaw.com

Attorneys for Donald J. Trump

CERTIFICATE OF SERVICE

I certify that on April 30, 2023, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Jesse R. Binnall

Jesse R. Binnall

Attorney for Donald J. Trump