

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION, and
RICHARD HUGHES,

Plaintiffs,

CASE NO.: 2:24-cv-14250-JEM
DIVISION:

v.

SHERIFF KEITH PEARSON, in his
official capacity as Sheriff of St. Lucie
County, the ST. LUCIE COUNTY
SHERIFF'S OFFICE, THOMAS
BAKKEDAHL, in his official capacity as
the State Attorney for the 19th Judicial
Circuit of Florida, and the STATE
ATTORNEY'S OFFICE for the 19th
Judicial Circuit of Florida,

Defendants.

CONSENT MOTION FOR EXTENTION OF TIME

COMES NOW, Defendants, THOMAS BAKKEDAHL, in his official capacity as the State Attorney for the 19th Judicial Circuit of Florida, and the STATE ATTORNEY'S OFFICE for the 19th Judicial Circuit of Florida, and Plaintiffs, GUN OWNERS OF AMERICA, INC., GUN OWNERS FOUNDATION, and RICHARD HUGHES, by and through the undersigned counsel, move the Court for an extension of time in the above captioned matter and in support thereof, states as follows:

1. Plaintiffs served upon THOMAS BAKKEDAHL, in his official capacity as the State Attorney for the 19th Judicial Circuit of Florida, and the STATE ATTORNEY'S OFFICE for the 19th Judicial Circuit of Florida, Plaintiffs' Complaint for Declaratory and Injunctive Relief on August 9, 2024.

2. Pursuant to Fed. R. Civ. Pro. Rule 12(a)(1)(A)(i), Defendant THOMAS BAKKEDAHL, in his official capacity as the State Attorney for the 19th Judicial Circuit of Florida, and the STATE ATTORNEY'S OFFICE for the 19th Judicial Circuit of Florida is required to serve a responsive pleading within twenty-one (21) days after being served with the summons and complaint, or August 30, 2024.

3. Pursuant to Fed. R. Civ. Pro. Rule 6(b)(1):

(1) In General. When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or

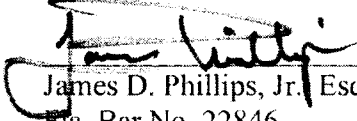
(B) on motion made after the time has expired if the party failed to act because of excusable neglect.

4. The Parties both consent to an extension of time for Defendants, THOMAS BAKKEDAHL, in his official capacity as the State Attorney for the 19th Judicial Circuit of Florida, and the STATE ATTORNEY'S OFFICE for the 19th Judicial Circuit of Florida to respond to the Plaintiffs' Complaint for Declaratory and Injunctive Relief to and through September 18, 2024.


5. The Parties represent that this Motion is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation.

WHEREFORE, Defendants, THOMAS BAKKEDAHL, in his official capacity as the State Attorney for the 19th Judicial Circuit of Florida, and the STATE ATTORNEY'S OFFICE for the 19th Judicial Circuit of Florida, and Plaintiffs, GUN OWNERS OF AMERICA, INC., GUN OWNERS FOUNDATION, and RICHARD HUGHES, respectfully request the Court grant an extension for Defendant THOMAS BAKKEDAHL, in his official capacity as the State Attorney for the 19th Judicial Circuit of Florida, and the STATE ATTORNEY'S OFFICE for the 19th Judicial Circuit of Florida to answer Plaintiffs' Complaint for Declaratory and Injunctive Relief.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9 day of September, 2024, a copy of the foregoing Consent Motion for Extension of Time has been electronically filed with CM/ECF for e-service on all parties of record.

JACOBS SCHOLZ & WYLER, LLC

/s/ Arthur I. Jacobs

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