

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KATHERINE NOVOTNY, ET AL., *

Plaintiffs, *

v. *

No. 1:23-cv-01295-RDB

WESLEY MOORE, ET AL., *

Defendants. *

* * * * *

CONSENT MOTION FOR EXTENTION OF TIME

Defendants, Governor Wesley Moore, Secretary of the Maryland State Police Col. Roland L. Butler, Jr., Harford County State’s Attorney Alison M. Healey, Baltimore County State’s Attorney Scott Shellenberger, Baltimore City State’s Attorney Ivan J. Bates, Maryland Secretary of Natural Resources Joshua Kurtz and Maryland Secretary of Transportation Paul J. Wiedefeld, all sued in their official capacities, hereby move, with the consent of plaintiffs, for an extension of time to respond the complaint filed by plaintiffs:

1. Plaintiffs filed his case on May 16, 2023, asserting a Second Amendment challenge to certain aspects of Maryland laws and regulations restricting the locations where gun owners are allowed to carry concealed firearms. (ECF 1.)

2. Defendants’ response to the complaint is due June 7, 2023.

3. Given the importance of the public policy issues presented by this case, as well as the work demands of other cases, Defendants' counsel requires additional time to prepare defendants' response to the complaint.

4. As a result, counsel for defendants requested plaintiffs' consent to a 21-day extension of time to respond to the complaint, and plaintiffs' counsel agreed.

WHEREFORE, for the reasons stated herein, defendants respectfully request that the Court enter an order extending defendants' time to respond to plaintiffs' complaint for 21 days, making the defendants' response due June 28, 2023.

Respectfully submitted,

ANTHONY G. BROWN
Attorney General of Maryland

/s/ Robert A. Scott

ROBERT A. SCOTT
Federal Bar No. 24613
Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
rscott@oag.state.md.us
(410) 576-7055
(410) 576-6955 (facsimile)

May 30, 2023

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that, on this 30th day of May, 2023 the foregoing was served by CM/ECF on all registered CMF users.

/s/ Robert A. Scott

Robert A. Scott