

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

JEFFREY LOWE, LAUREN LOWE,  
GREATER WYNNEWOOD EXOTIC  
ANIMAL PARK, LLC, and TIGER KING,  
L.L.C.,

Defendants.

**No. 20-cv-00423-JFH**

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CARRIE M. LEO,  
Plaintiff-Intervenor,

v.

THE UNITED STATES OF AMERICA,  
JEFFREY AND LAUREN LOWE,

Defendants-in-Intervention.

**INTERVENOR'S MOTION FOR  
EXTENSION OF TIME**

[AND LEAVE TO FILE]

(Fed. R. Civ. P. 6(b) and 15(a)(3))

**NOW COMES** the Intervening Plaintiff, Carrie Leo, as a self-represented litigant, pursuant to Rules 12, 6(b) and 15(a)(3) of the Federal Rules of Civil Procedure, move this Court for an order to extend time to file an answer or otherwise plead in the above-titled action, including, if needed, leave to file a reply to the USA's response entitled ***THE UNITED STATES RESPONSE TO CARRIE LEO'S MOTION TO INTERVENE***. In support hereof, Ms. Leo shows the following:

1. Intervening Plaintiff filed a *Motion to Intervene* on August 26, 2021, as a result of the Defendant-in-Intervention USA performed an unlawful seizure of Intervening Plaintiff's animals when Jeff Lowe signed an

acknowledgement of abandonment on August 13, 2021. The signed acknowledgement allowed the federal government to seize the rest of the animals residing at Lowes' Thackerville facility by August 18, 2021, including those owned by the Intervening Plaintiff.

2. Defendant-in-Intervention USA filed its response to the *Motion to Intervene* on September 9, 2021.
3. According to Rule 12, the Intervening Plaintiff has 14 days to issue a reply to USA's response to her *Motion to Intervene* providing her with a deadline set for the end of the month.
4. The time for filing a reply or other pleading has not yet expired.
5. This motion is not being made for the purpose of delay but is made based upon current workload and the need for time to prepare a response and have it reviewed by an attorney.

**WHEREFORE**, Intervening Plaintiff respectfully requests the Court for an order extending the time to file an answer or otherwise plead up to and including 30 September 2021, or in the alternative, a deadline acceptable by the Court which would enlarge the time for the Intervening Plaintiff to file her reply to the Defendant-in-Intervention's response to the *Motion to Intervene*. Ms. Leo also requests leave to file a reply, if needed.

This the 22nd day of September 2021.

Respectfully Submitted,

s/ Carrie M. Leo

Carrie M. Leo, *Intervening Plaintiff, pro se*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document, entitled ***MOTION FOR EXTENSION OF TIME*** was sent to all involved parties on September 22, 2021. It was sent both by way of everyone's electronic mail account as well as transmitted electronically by means of the court's electronic filing system, to the following:

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*s/ Carrie M. Leo*

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