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*Attorneys for Gonzalez Plaintiffs*

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF ARIZONA

13 Maria M. Gonzalez, et al.,  
14  
15 Plaintiffs; and  
16 Inter Tribal Council of Arizona, et al.,  
17  
18 Plaintiffs;  
19 v.  
20 State of Arizona, et al.,  
21  
22 Defendants.

No. CV-06-1268-PHX-ROS(Lead)  
No. CV-06-1362-PCT-JAT(Cons.)

**GONZALEZ PLAINTIFFS’  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
REPLY TO 13 COUNTIES’ RESPONSE  
TO GONZALEZ PLAINTIFFS’  
AMENDED MOTION FOR FEES**

(ASSIGNED TO THE HON. ROSLYN O.  
SILVER)

23  
24 COME NOW, Plaintiffs Jesus Gonzalez, et al. (the “Gonzalez Plaintiffs”) and file  
25 this unopposed motion for extension of time to file a reply to the Response of Apache,  
26 Cochise, Gila, Graham, Greenlee, La Paz, Maricopa, Mohave, Pima, Pinal, Santa Cruz,  
27 Yavapai and Yuma County Defendants (“County Defendants”) to Gonzalez Plaintiffs’  
28

1 Amended Motion for Attorneys' Fees and Expenses. The purpose of this motion is to  
2 extend the deadline to reply to the County Defendants' Response to the date on which  
3 Gonzalez Plaintiffs must reply to the State's Response. Thus, Gonzalez Plaintiffs request  
4 that the deadline to reply be extended to April 7, 2014. In support of this motion,  
5 Gonzalez Plaintiffs show:  
6

- 7 1. Gonzalez Plaintiffs' Amended Motion for Attorney's Fees and Expenses is  
8 pending before this Court. On March 5, 2014, this Court extended the State's  
9 deadline to respond to Gonzalez Plaintiffs' fees motion to March 28, 2014. *See*  
10 Dkt. 1138.  
11
- 12 2. As a result of the extension, Gonzalez Plaintiffs' reply in response to the State's  
13 brief is due April 7, 2014.  
14
- 15 3. In order to increase efficiency in preparing their arguments and negotiating any  
16 possible settlements with Defendants, Gonzalez Plaintiffs request the same  
17 deadline of April 7 to reply to both State and County Defendants' briefs.  
18
- 19 4. Fed. R. Civ. P. 6(b)(1)(a) provides that the Court may extend the deadline for  
20 submission of a filing for good cause shown. The Gonzalez Plaintiffs submit this  
21 motion not for delay, but for the good cause shown. The deadline requested by the  
22 Gonzalez Plaintiffs will not cause any undue prejudice to the other parties in this  
23 case and this motion is unopposed.  
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- 25 5. For the reasons set forth above, the Gonzalez Plaintiffs respectfully request an  
26 extension of time for Gonzalez Plaintiffs to file their reply to the County  
27 Defendants' brief until April 7, 2014.  
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Dated: March 13, 2014

Respectfully submitted,

s/ Nina Perales  
MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND

Daniel R. Ortega, Jr.  
ORTEGA LAW FIRM, P.C.

Karl J. Sandstrom  
PERKINS COIE LLP

*Attorneys for Gonzalez Plaintiffs*

**CERTIFICATE OF CONFERENCE**

On March 5, 2014, the undersigned counsel for the Gonzalez Plaintiffs conferred with counsel of record for the parties regarding the above-referenced Motion, who responded as follows: counsel for the 13 County Defendants do not oppose this motion. On March 13, 2014, the undersigned counsel for the Gonzalez Plaintiffs conferred with counsel of record for the parties regarding the above-referenced Motion, who responded as follows: counsel for Plaintiffs Inter Tribal Council of Arizona, et al., and counsel for Defendants the State of Arizona, the Arizona Secretary of State, do not oppose this motion.

/s/ Nina Perales  
Nina Perales

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2014, I electronically transmitted the foregoing

1 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a  
2 Notice of Electronic Filing to ECF registrants.

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5 /s/ Nina Perales  
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