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Attorneys for Gonzalez Plaintiffs

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF ARIZONA

13 Maria M. Gonzalez, et al.,
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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
JOINT PROPOSED FINAL
JUDGMENT**

(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 joint proposed final judgment until
26 August 23, 2013. In support of this motion, Gonzalez Plaintiffs show:
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1. On July 22, 2013, this Court issued an order directing that “no later than July 26, 2013 the parties shall file a joint proposed final judgment.” Dkt. 1110. On July 26, 2013, in an unopposed motion, Defendants State of Arizona and Arizona Secretary of State Ken Bennett filed for, and were granted, a continuance of the deadline to file the joint proposed final judgment until August 2, 2013. *See* Dkt. 1111, 1112.
2. Because the parties are working diligently to reach agreement on the wording of the joint proposed final judgment and agree that they need more time in which to develop the joint proposed final judgment, the Gonzalez Plaintiffs respectfully request until August 23, 2013, a three-week extension, for the parties to file their joint proposed final judgment.
3. The parties have been actively working to reach an agreement, convening repeatedly over the past several weeks, but have not completed their task. The parties communicated by email on July 23, July 24, July 25, July 26, July 30, July 31, August 1 and August 2. In addition, the parties discussed the contents of the joint proposed final judgment in conference calls held on August 1 and August 2.
4. The parties have discussed whether all relief sought in the final judgment must be set out specifically in the proposed judgment and may not be included, in part, by reference to past orders of this Court. This issue requires substantially more communication between the parties to reach mutually-agreeable language specifying the injunctive relief warranted by the Supreme Court’s decision in this case.

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5. Fed. R. Civ. P. 6(b)(1)(a) provides that the Court may extend the deadline for submission of a filing for good cause shown. The Gonzalez Plaintiffs submit this motion not for delay, but for the good cause shown. The deadline requested by the Gonzalez Plaintiffs will not cause any undue prejudice to the other parties in this case; in fact, no other party opposes this request.
6. For the reasons set forth above, the Gonzalez Plaintiffs respectfully request an extension of time for all the parties to submit a joint proposed final judgment until August 23, 2013.

Dated: August 2, 2013

Respectfully submitted,

s/ Nina Perales
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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2013, electronically transmitted the foregoing document to the Clerk’s Office using the CM/ECF System for filing, and transmittal of a Notice of Electronic Filing to ECF registrants.

/s/ Nina Perales
Nina Perales