

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:24-cv-21983-JB

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

v.

FLORIDA HOUSE OF REPRESENTATIVES  
and CORD BYRD, in his official capacity as  
Florida Secretary of State,

Defendants.

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**DEFENDANTS' MOTION FOR EXTENSION OF TIME  
TO FILE REPLIES IN SUPPORT OF MOTIONS TO DISMISS**

Defendants, the Florida House of Representatives and the Secretary of State, respectfully move for a 14-day extension of time through August 13, 2024, to file their replies in support of their respective motions to dismiss.

1. Plaintiffs filed their operative complaint on June 25, 2024. ECF No. 31.
2. Defendants filed motions to dismiss on July 9, 2024. ECF Nos. 32 & 33.
3. Plaintiffs' responses to the motions to dismiss are due on July 23, 2024. S.D.

Fla. L.R. 7.1(c)(1). Defendants' replies are due on July 30, 2024. *Id.*

4. Counsel for the Florida House of Representatives is lead counsel to two state agencies in a class action that is scheduled for a weeklong trial from July 29, 2024, to August 2, 2024. *See Chianne D. v. Weida*, No. 3:23-cv-00985 (M.D. Fla.). A two-week extension of

time would accommodate counsel's other client commitments, prevent substantial hardship, and enable the House to present its arguments in a manner that best assists this Court.

5. Counsel for the Secretary asks for a similar extension. This is to align deadlines for all motions to dismiss so that counsel for the House and Secretary can coordinate to avoid redundant arguments. An extension would also allow counsel for the Secretary to focus on upcoming obligations before two different state trial courts, namely a corporate representative deposition, a motion to dismiss hearing, and a motion to stay hearing.

6. Defendants seek this extension in good faith and not for the purpose of delay.

7. A proposed order is attached as Exhibit A.

**WHEREFORE**, the Florida House of Representatives and the Secretary of State respectfully move for a 14-day extension of time through August 13, 2024, to file their replies in support of their respective motions to dismiss.

**CERTIFICATE OF GOOD-FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3)(A), undersigned counsel certify that counsel for the House has conferred on behalf of both Defendants with counsel for Plaintiffs in a good-faith effort to resolve the issues presented in this motion. Plaintiffs do not oppose the House's request for a 14-day extension. Plaintiffs take no position on an extension of the Secretary's reply deadline.

Dated July 23, 2024.

Respectfully submitted,

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# **Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:24-cv-21983-JB

CUBANOS PA'LANTE, *et al.*,

Plaintiffs,

**THREE-JUDGE COURT**

v.

FLORIDA HOUSE OF REPRESENTATIVES  
and CORD BYRD, in his official capacity as  
Florida Secretary of State,

Defendants.

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**ORDER ON DEFENDANTS' MOTION FOR EXTENSION OF  
TIME TO FILE REPLIES IN SUPPORT OF MOTIONS TO DISMISS**

This matter is before the Court on Defendants' Motion for Extension of Time to File Replies in Support of Motions to Dismiss (ECF No. \_\_\_\_). Defendants seek a 14-day extension of time through August 13, 2024, to file their replies in support of their motions to dismiss (ECF Nos. 32 & 33). The Court finds that good cause supports the request. The Court therefore **ORDERS** and **ADJUDGES** as follows:

1. Defendants' Motion for Extension of Time to File Replies in Support of Motions to Dismiss (ECF No. \_\_\_\_ ) is **GRANTED**.
2. Defendants must file their replies in support of their motions to dismiss by August 13, 2024.

**DONE AND ORDERED** this \_\_\_\_ day of \_\_\_\_\_ 2024.

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**BRITT C. GRANT**  
**UNITED STATES CIRCUIT JUDGE**

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**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

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**JACQUELINE BECERRA**  
**UNITED STATES DISTRICT JUDGE**