

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**  
(Northern Division)

**BALTIMORE COUNTY BRANCH  
OF THE NATIONAL ASSOCIATION  
FOR THE ADVANCEMENT OF  
COLORED PEOPLE, *et al.***

*Plaintiffs,*

**-vs.-**

**BALTIMORE COUNTY,  
MARYLAND, *et al.***

*Defendants.*

**Civil Action No. 21-cv-03232-LKG**

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**JOINT MOTION  
FOR EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT**

Plaintiffs Baltimore County Branch of the National Association for the Advancement of Colored People, League of Women Voters of Baltimore County, Common Cause Maryland, Charles Sydnor, Anthony Fugett, Dana Vickers Shelley, Danita Tolson, Sharon Blake, Gerald Morrison, and Niesha McCoy (collectively, “Plaintiffs”) and Defendant Baltimore County Board of Elections (“BOE”) hereby jointly submit this Motion seeking an extension of time by which BOE must answer or otherwise respond to the Complaint. In support thereof, the Parties state the following:

1. On February 1, 2022, this Court entered an Order granting the Parties’ request to extend the time by which BOE was to answer or otherwise respond to the Complaint. Consistent with the Parties’ request, the Order instructed BOE to answer or otherwise respond to the Complaint within “30 days from the date on which the Court issues a ruling on Plaintiffs’ pending motion for preliminary injunction.”

2. On February 22, 2022, the Court issued a Memorandum Opinion and Order granting Plaintiffs' Motion for Preliminary Injunction, making BOE's responsive pleading due on **March 24, 2022**.

3. In the interim, the Court has ordered that the Parties present additional briefing, testimony and argument on issues related to the Court's February 22, 2022 Order.

4. Accordingly, the Parties request that the date by which BOE must answer or otherwise respond to the Complaint be extended an additional 30 days: from March 24, 2022 to **April 25, 2022**.

5. In submitting this Motion, BOE expressly reserves all rights and defenses it may have to this action, including the right to file a motion to dismiss on any and all claims raised in the Complaint.

**Dated: March 18, 2022**

**Respectfully and jointly submitted,**

*For Plaintiffs*

*For Defendant Baltimore County Board of Elections*

*/s/ Andrew D. Freeman (w/ Authority)*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this **18th** day of **March, 2022**, I caused a true and correct copy of the foregoing Joint Motion to be served upon all counsel of record via the Court's CM/ECF system.

**Dated: March 18, 2022**

*/s/ Aaron A. Nichols*

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