

UNITED STATE DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

DAVID B. MEANS, ET AL

CIVIL ACTION NO. 5:23-cv-00669

VERSUS

JUDGE DAVID C. JOSEPH

DESOTO PARISH, ET AL.

MAGISTRATE JUDGE HORNSBY

**EX PARTE MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION  
BRIEF TO PLAINTIFFS' REQUEST FOR A PRELIMINARY INJUNCTION**

NOW INTO COURT, through undersigned counsel, come Defendants Desoto Parish and Desoto Parish Police Jury (the "Defendants") which hereby request an additional 14 days up to and through July 7, 2023 to file an opposition brief to Plaintiffs' request for a preliminary injunction for the following reasons:

1. Undersigned counsel was just retained by the Defendants four days ago.
2. The Defendants were served with the Summons and the First Amended Complaint in this case on May 26, 2023. The First Amended Complaint is 32 pages long and involves 103 separately numbered paragraphs.
3. On May 26, 2023, Plaintiffs filed a Memorandum in Support of an Amended Motion for Preliminary Injunction (the "Preliminary Injunction Memorandum").
4. By Order dated June 5, 2023, this Court set a deadline of June 23, 2023 for Defendants to file their response to the Amended Motion for Preliminary Injunction.
5. Plaintiffs Preliminary Injunction Memorandum is 40 pages long, has exhibits totaling over 350 pages, and raises a number of factual issues which will take time to investigate and respond.

6. Undersigned counsel have a number of other pressing matters in addition to this case.

7. A short two-week extension up to and through July 7, 2023 is needed to sufficiently respond to Plaintiffs' Amended Motion for Preliminary Injunction given the length of Plaintiffs' Preliminary Injunction Memorandum and exhibits thereto, the complexity and fact intensive nature of the arguments, and the other pressing matters facing undersigned counsel.

8. There is no hearing date on the preliminary injunction in this case set as of now, and the requested short extension which wraps around the 4<sup>th</sup> of July weekend would not cause undue delay or prejudice to the other side.

9. Counsel for the Plaintiffs has been contacted and has advised that they object to this extension.

WHEREFORE, it is respectfully requested that this Motion be granted and Defendants be allowed an additional 14 days, from June 23, 2023 to and through July 7, 2023, to file an opposition brief to Plaintiffs' request for preliminary injunction.

RESPECTFULLY SUBMITTED,

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*/s/ Claude F. Reynaud, Jr.*

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**CERTIFICATE PURSUANT TO LOCAL RULE 7.9**

In accordance with Local Rule 7.9, undersigned counsel hereby certifies that counsel for Plaintiffs was contacted via email on June 16, 2023 and Plaintiffs' counsel objects to this extension of time. The reason for the objection was not stated.

*/s/ Claude F. Reynaud, Jr.*

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Claude F. Reynaud, Jr.

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**ORDER**

Considering the foregoing Ex Parte Motion for Extension of Time to File Opposition Brief to Plaintiffs' Request for a Preliminary Injunction filed by Defendants Desoto Parish and Desoto Parish Police Jury (the "Defendants"),

**IT IS HEREBY ORDERED** that Defendants' Motion is GRANTED and the Defendants are allowed an additional 14 days up to and through July 7, 2023 to file an opposition brief to Plaintiffs' request for a preliminary injunction.

**THUS DONE AND SIGNED** on this \_\_\_\_ day of \_\_\_\_\_ 2023, in Shreveport, Louisiana.

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HON. DAVID C. JOSEPH  
UNITED STATES DISTRICT JUDGE