

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DEBORAH SPRINGER SUTTLAR, JUDY GREEN, FRED LOVE, in his individual and official capacity as State Representative, KWAMI ABDUL-BEY, CLARICE ABDUL-BEY, and PAULA WITHERS,

Plaintiffs,

v.

JOHN THURSTON, in his official capacity as the Secretary of State of Arkansas and in his official capacity as the Chairman of the Arkansas State Board of Election Commissioners; and SHARON BROOKS, BILENDA HARRIS-RITTER, WILLIAM LUTHER, CHARLES ROBERTS, WENDY BRANDON, JAMIE CLEMMER and JAMES HARMON SMITH III, in their official capacities as members of the Arkansas State Board of Election Commissioners,

Defendants.

Case No. 4:22-cv-368-KGB

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

Plaintiffs Deborah Springer Suttlar, Judy Green, Fred Love, in his individual capacity and official capacity as State Representative, Kwami Abdul-Bey, Clarice Abdul-Bey and Paula Withers ("Plaintiffs") move for an extension of time to respond to Defendants motion to dismiss (Dkt. No. 6). Plaintiffs request that the deadline for Plaintiffs to respond to Defendants' Motion to Dismiss be set for 14 days from the date of the Court's ruling on Plaintiffs' Motion for Remand.

In support of their motion, Plaintiffs state as follows:

1. On March 21, 2022, Plaintiffs filed their Complaint against Defendants in the Circuit Court of Pulaski County, Arkansas, alleging that Arkansas' recently enacted congressional map violated provisions of the Arkansas Constitution by adopting a congressional map that unconstitutionally dilutes the vote of Black voters in Pulaski County, Arkansas.

2. Defendants filed their Notice of Removal on April 22, 2022 (Dkt. No. 1) and filed a Motion to Dismiss on April 29, 2022. (Dkt. No. 6).

3. Plaintiffs filed a Motion for Remand and a Motion to Stay on May 6, 2022. (Dkt. Nos. 9-11). Plaintiffs filed a brief in support of their Motion to Stay today, May 10, 2022. (Dkt. 12).

4. Plaintiffs' response to Defendants' Motion to Dismiss is due this Friday, May 13, 2022. E.D. Ark. Loc. R. 7.2(b).

5. Plaintiffs' Motion for Remand raises jurisdictional issues that should be addressed prior to any merits adjudication. Accordingly, Plaintiffs request that the deadline for Plaintiffs to respond to Defendants' Motion to Dismiss be set for 14 days from the date of the Court's ruling on Plaintiffs' Motion for Remand. E.D. Ark. Loc. R. 7.2(d).

6. Plaintiffs' Motion for Extension of Time is not intended to harass or cause delay. Further, no party will suffer prejudice if Plaintiffs' Motion for Extension of Time is granted.

WHEREFORE, Plaintiffs Deborah Springer Suttlar, Judy Green, Fred Love, in his individual capacity and official capacity as State Representative, Kwami Abdul-Bey, Clarice Abdul-Bey and Paula Withers moves for an extension of time to respond to Defendants' Motion to Dismiss.

Respectfully submitted,

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**Motion for Pro Hac Vice Forthcoming*