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**IN THE THIRD JUDICIAL DISTRICT COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

LEAGUE OF WOMEN VOTERS OF UTAH,  
MORMON WOMEN FOR ETHICAL  
GOVERNMENT, STEFANIE CONDIE,  
MALCOLM REID, VICTORIA REID,  
WENDY MARTIN, ELEANOR  
SUNDWALL, and JACK MARKMAN,

Plaintiffs,

v.

UTAH STATE LEGISLATURE, UTAH  
LEGISLATIVE REDISTRICTING  
COMMITTEE; SENATOR SCOTT  
SANDALL, in his official capacity;  
REPRESENTATIVE BRAD WILSON, in his  
official capacity; SENATOR J. STUART  
ADAMS, in his official capacity; and  
LIEUTENANT GOVERNOR DEIDRE  
HENDERSON, in her official capacity,

Defendants.

**PLAINTIFFS' RESPONSE TO  
LEGISLATIVE DEFENDANTS'  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFFS'  
MOTION FOR SUMMARY JUDGMENT  
AND FIRST AMENDED COMPLAINT**

Case No. 220901712

Honorable Dianna Gibson

Plaintiffs are sympathetic to Legislative Defendants' counsel—Plaintiffs' counsel likewise had different plans for how they would spend the past three weeks, as this Court no doubt did as well. But Plaintiffs did not cause the Amendment D detour, and every delay in resolving the merits of Plaintiffs' claims at this stage will merely multiply the need for more accelerated proceedings later.

At this point, the calendar does not permit another three-week extension. It was the Legislature's actions that caused the parties' and the Court's diversion to litigating Amendment D for the past three weeks. That was unfortunate for all involved. But Plaintiffs and the Court should not see their time to undertake future work in this matter truncated on account of Legislative Defendants' unconstitutional conduct. Certainly, Legislative Defendants must not be heard to complain later when their own deadlines are shortened from what they otherwise would have been.

Cognizant of Legislative Defendants' counsels' workload but balancing Plaintiffs' need for timely relief in this case, Plaintiffs request that Legislative Defendants' response deadline for the pending summary judgment motion and amended complaint be extended no more than one week—to **October 25, 2024**.<sup>1</sup> That provides them an entire month from today, which—considering they have had Plaintiffs' motion and amended complaint for a month already—is more than sufficient time to prepare their responses.

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<sup>1</sup> Plaintiffs' counsel were not contacted before the filing of Legislative Defendants' motion seeking an extension of time. Plaintiffs would have offered this week extension if they had been asked.

September 27, 2024

Respectfully submitted,

/s/ David C. Reymann

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 27th day of September, 2024, I filed the foregoing **PLAINTIFFS' RESPONSE TO LEGISLATIVE DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND FIRST AMENDED COMPLAINT** via electronic filing, which served all counsel of record.

/s/ David C. Reymann