

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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No. 12-1437  
(1:10-cv-02068-BEL)  
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RAYMOND WOOLLARD;  
SECOND AMENDMENT FOUNDATION, INC.

Plaintiffs - Appellees,

v.

DENIS GALLAGHER; SEYMOUR GOLDSTEIN;  
CHARLES M. THOMAS, JR.; MARCUS L. BROWN

Defendants - Appellants,

TERRENCE SHERIDAN

Defendant.

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APPELLEES' CONSENT MOTION FOR EXTENSION OF TIME

Appellees respectfully move the Court to extend the deadline for the filing of their brief from July 16, 2012, to July 30, 2012, and for the reply brief to August 22, 2012, for the following reasons:

1. Appellants filed their opening brief on June 15, 2012.
2. With Appellees' consent, four amicus briefs were filed in support of Appellants on June 22, 2012.
3. Following several modifications to the deadlines in *Piszczatoski v. Filko*, U.S. Ct. of Appeals, 3d Cir. No. 12-1150, counsel's reply brief in that case is now due the same day as the Appellees' Brief in this case. Appellees' lead counsel was ordered to file a supplemental brief in *Kachalsky v. Cacase*, 2d Cir. No. 11-3642, on June 29, 2012,

and will have to file a reply to opposing parties' supplemental brief in that case on July 13, 2012. Additionally, on July 6, 2012, counsel has due a response to the government's submission of proposed facts in *Libertarian National Committee, Inc. v. Federal Election Commission*, U.S. Dist. Ct., Dist. of Columbia No. 11-562. And counsel has due a reply brief on July 10, 2012, in *People v. Medina*, Appellate Div. Los Angeles County (Cal.) Superior Ct. No. BR049672.

4. Considering the press of this business, and the large volume of amicus briefs filed in support of Appellants, Appellees respectfully request a two week extension for the submission of their brief, to July 30, 2012.
5. Appellants consent to this motion, if their schedule can also be accommodated such that the Reply Brief would be extended by a week, to August 22, 2012.
6. Oral argument has not yet been scheduled. Appellees' counsel is not available for the next scheduled sittings September 18-21, and October 4, 2012. Accordingly, Appellees do not believe that the extension would delay the hearing or resolution of this case.

WHEREFORE, Appellees respectfully request that this Court enter an order extending the time in which they may file their brief, from July 16, 2012 to July 30, 2012 and the Reply Brief to August 22, 2012. A proposed order is attached.

Dated: July 5, 2012

Respectfully submitted,

/s/ Alan Gura  
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Counsel for Appellees

CERTIFICATE OF SERVICE

I certify that on July 5, 2012, the foregoing motion was served on counsel of record for all parties through the CM/ECF system.

/s/ Alan Gura  
Alan Gura