

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Richmond Division

SEALED PLAINTIFF 1)	
and)	
SEALED PLAINTIFF 2,)	
)	
Plaintiffs,)	Civil Action No. 3:22 cv 670-MHL
)	
v.)	
)	
PATRIOT FRONT, et al.)	
)	
Defendants.)	

**DEFENDANTS’ AGREED MOTION FOR EXTENSION
OF TIME AND INCORPORATED MEMORANDUM**

Defendants Nathan Noyce, Thomas Dail, Paul Gancarz, Daniel Turetchi, and Aedan Tredinnick (together “Defendants”), by counsel and pursuant to Fed. R. Civ. P. 6(b)(1) and Local Civil Rule 7(F)(2)(b), hereby move this Court for an extension of time up to and including April 25, 2024, to file answers to the Plaintiffs’ Amended Complaint. Defendants state in support of this unopposed motion:

1. The Court denied Defendants’ motions to dismiss on March 31, 2024. Defendants’ answers, accordingly, would be due April 15, 2024.
2. The Amended Complaint is a fairly lengthy one and there are multiple Defendants in different locations with different schedules. Five separate answers need to be filed.
3. No prior motions for extension of time have been made as to these answers.
4. This extension is not meant for improper delay of this proceeding.

5. Counsel for Plaintiffs has told Defendants' counsel that they consent to this motion.

6. A proposed Order is attached as Exhibit 1.

WHEREFORE, Defendants request that the Court grant them an extension of time up to and including April 25, 2024 to file answers to Plaintiffs' Amended Complaint.

Respectfully submitted,

NATHAN NOYCE
THOMAS DAIL
PAUL GANCARZ
DANIEL TURETCHI
AEDAN TREDINICK

By: _____/s/_____
Counsel

Bradley P. Marrs (VSB#25281)
Marrs & Henry
7202 Glen Forest Drive, Suite 307
Richmond, VA 23226
Tel. (804) 662-5716
Fax (804) 662-5712
bmarrs@marrs-henry.com

Glen K. Allen, *Pro Hac Vice*
Glen Allen Law
5423 Springlake Way
Baltimore, MD 21212
Tel. (410) 802-6453
glenallenlaw@protonmail.com

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2024, true and accurate copies of the foregoing were served via ECF procedures of this Court to the following counsel of record:

Michael R. Shebelskie
Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
mshebelskie@huntonak.com

Ryan P. Phair
Hunton Andrews Kurth LLP
2200 Pennsylvania Avenue, NW, Suite 900
Washington, DC 20037-1701
rphair@huntonak.com

Edward G. Caspar
Arthur Ago
Lawyers' Committee for Civil Rights Under Law
1500 K Street, NW, Suite 900
Washington, DC 20005
ecaspar@lawyerscommittee.org
g
aago@lawyerscommittee.org

_____/s/_____
Bradley P. Marrs (VSB#25281)
Marrs & Henry
7202 Glen Forest Drive, Suite 307
Richmond, VA 23226
Tel. (804) 662-5716
Fax (804) 662-5712
bmarrs@marrs-henry.com
Counsel for Defendants