

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SEALED PLAINTIFF 1,)	
)	
and)	
)	
SEALED PLAINTIFF 2,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:22cv670-MHL
)	
PATRIOT FRONT, et al.,)	
)	
Defendants.)	

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

Defendants Noyce, Dail, Gancarz, Turetchi, and Tredinnick. 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 18, 2023, within which to file a reply brief in further support of their motion to dismiss. Defendants state in support of this unopposed motion:

1. Defendants Noyce and Dail filed and served a Rule 12(b)(6) motion to dismiss on March 1, 2023. Defendants Gancarz, Turethi, and Tredinnick subsequently joined the motion.
2. Plaintiffs, in accordance with an agreed extension, filed their brief in opposition to the motion on March 29, 2023.
3. Defendants’ reply brief is due April 4, 2023.
4. Plaintiffs’ lengthy opposition brief presents numerous constitutional and statutory arguments, and Defendants desire sufficient time to prepare a thorough brief for the Court addressing those grounds. Also, Good Friday and Easter occur April 7-9, 2023.

5. No prior motions for extension of time have been made for Defendants' reply brief.
6. This extension is not meant for improper delay of this proceeding.
7. Counsel for Plaintiffs have told Defendants' counsel that they consent to this motion.

WHEREFORE, Defendants request that this Court grant them an extension of time up to and including April 18, 2023 to file a reply brief in further support of their motion to dismiss. A proposed order is attached as Exhibit 1.

Respectfully submitted,

By: _____/s/_____
Counsel

Bradley P. Marris (VSB#25281)
Marris & Henry
7202 Glen Forest Drive, Suite 307
Richmond, VA 23226
Tel. (804) 662-5716
Fax (804) 662-5712
bmarris@marris-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 3, 2023, true and accurate copies of the foregoing were served via ECF procedures of this Court to the all counsel of record.

_____/s/_____
Bradley P. Marris (VSB#25281)
Marris & Henry
7202 Glen Forest Drive, Suite 307
Richmond, VA 23226
Tel. (804) 662-5716
Fax (804) 662-5712
bmarris@marris-henry.com
Counsel for defendants
Nathan Joyce and Thomas Dail