

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION AT COVINGTON

NICHOLAS SANDMANN, by and through
his parents and natural guardians, TED
SANDMANN and JULIE SANDMANN,

Plaintiff,

v.

WP COMPANY LLC, d/b/a THE
WASHINGTON POST,

Defendant.

No. 2:19-cv-19-WOB-CJS

NICHOLAS SANDMANN, by and through
his parents and natural guardians, TED
SANDMANN and JULIE SANDMANN,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

No. 2:19-cv-31-WOB-CJS

NICHOLAS SANDMANN, by and through
his parents and natural guardians, TED
SANDMANN and JULIE SANDMANN,

Plaintiff,

v.

NBCUNIVERSAL MEDIA, LLC,

Defendant.

No. 2:19-cv-56-WOB-CJS

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF’S
STATUS REPORT REGARDING ADDITIONAL LAWSUITS PURSUANT TO AGREED
ORDER**

COMES NOW, Nicholas Sandmann, by and through his parents and natural guardians Ted Sandmann and Julie Sandmann (“Plaintiff”), and respectfully moves this Court to extend the time by which Plaintiff must file the Plaintiff’s Status Report Regarding Additional Lawsuits pursuant to the Agreed Order entered on January 15, 2020 in the actions styled *Sandmann v. WP Company, LLC d/b/a The Washington Post*, No. 2:19-cv-19-WOB-CJS (E.D. Ky. *filed* Feb. 19, 2019) [Doc. 74]; *Sandmann v. Cable News Network, Inc.*, No. 2:19-cv-31-WOB-CJS (E.D. Ky. *filed* Mar. 12, 2019) [Doc. 57]; and *Sandmann v. NBCUniversal Media, LLC*, No. 2:19-cv-56-WOB-CJS (E.D. Ky. *filed* May 1, 2019) [Doc. 55] (the “Status Report”). Plaintiff respectfully requests an additional week—up to and including February 25, 2020—to prepare the Status Report. No party opposes Plaintiff’s request. A memorandum in support and proposed order are attached.

Respectfully submitted this 18th day of February, 2020.

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MEMORANDUM IN SUPPORT

Pursuant to Local Rule 7.1(b), motions for extensions of time that are not by agreed order must be accompanied by (1) the reasons for the extension and (2) whether the other parties consent. Each point supporting the Plaintiff's Motion for Extension of Time to File Plaintiff's Status Report Regarding Additional Lawsuits (the "Motion" or "Status Report" or "Extension of Time") will be addressed below.

First, Plaintiff Nicholas Sandmann ("Plaintiff") requires this Extension of Time because it is necessary for Plaintiff to finalize his investigation into other entities who have either published or republished Phillips' false narrative that Nicholas blocked or otherwise restricted Phillips' free movement at the January 18 incident at the National Mall (the "January 18 Events"). Since Plaintiff seeks to provide this Court with the fullest picture possible of the potential defendants that Plaintiff might sue in this Court or any other court, Plaintiff requires additional time to investigate the extent of the republication of Phillips' false narrative by other entities and individuals throughout the internet and social media platforms.

Second, Plaintiff contacted local counsel for the three other parties (WP Company, LLC d/b/a The Washington Post, Cable News Network, Inc., and NBCUniversal Media, LLC) today, February 18, 2020, by telephone to ask each for consent to this extension of time. No party opposes Plaintiff's request.

For the reasons stated above, the Plaintiff's Motion for Extension of Time to File Plaintiff's Status Report Regarding Additional Lawsuits should be granted. A proposed order is attached.

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2020, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Todd V. McMurtry

Plaintiff's Counsel