

**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,**

Plaintiffs,

V.

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

Defendant.

CASE NO. 2:19-cv-19-WOB-CJS
JUDGE WILLIAM O. BERTELSMAN

CONSENT MOTION FOR EXTENSION OF TIME
AND ADDITIONAL PAGES RELATING TO
THE WASHINGTON POST’S MOTION TO DISMISS

COMES NOW, Nicholas Sandmann, by and through his parents and natural guardians, Ted Sandmann and Julie Sandmann ("Plaintiffs"), as well as WP Company LLC d/b/a The Washington Post ("Post"), by and through their respective counsel, and file this Consent Motion for Extension of Time and Additional Pages in regard to the Plaintiffs' Response Brief and the Post's Reply Brief relating to the Post's Motion to Dismiss Plaintiffs' Complaint, showing the Court as follows:

On February 19, 2019, Plaintiffs filed their Complaint against the Post. On or about March 18, 2019, the Post sought and Plaintiffs agreed to a two-week extension of its deadline to file its Motion to Dismiss, which the Court thereafter granted. [Doc. 17]. On April 2, 2019, the Post sought and the Court granted to the Post a forty-five (45) page limit for its brief in support of its Motion to Dismiss. On April 9, 2019, the Post filed its

Motion to Dismiss, triggering an April 30, 2019, deadline for Plaintiffs to respond pursuant to Local Rule 7.1(c). [Doc. 27].

By agreement of the parties and pursuant to Local Rules 7.1(c) and 7.1(d), Plaintiffs now move for a reciprocal extension of time and additional pages to respond to the Post's Motion to Dismiss. The Post filed a forty-five (45) page brief and; to address each issue raised by the Post as well as the breadth of the Post's reporting at issue in this case, Plaintiffs seek the same number of pages. Additionally, the Post moves for an extension of time of one (1) week and expansion of page limit to twenty (20) pages for its Reply Brief.

Accordingly, Plaintiffs respectfully request that the Court enter an Order providing Plaintiffs with a deadline of May 14, 2019, to file a brief in response and in opposition, not exceeding forty-five (45) pages, to the Post's Motion to Dismiss. The Post respectfully requests that the Court also enter an Order providing the Post with a deadline of June 4, 2019 to file its Reply Brief, not exceeding twenty (20) pages. A proposed order is attached hereto as Exhibit A.

Respectfully submitted this 18th day of April, 2019.

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