

UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

DAVID B. MEANS, ET AL	§	CIVIL ACTION NO. 5:23-cv-00669
	§	
VERSUS	§	JUDGE DAVID C. JOSEPH
	§	
DESOTO PARISH, ET AL.	§	MAGISTRATE JUDGE HORNSBY
	§	

**REPLY BRIEF IN SUPPORT OF DEFENDANTS’ MOTION FOR EXTENSION
OF TIME TO FILE PRELIMINARY INJUNCTION OPPOSITION BRIEF**

This reply brief is respectfully submitted by Defendants, DeSoto Parish and the DeSoto Parish Police Jury (the “**Defendants**”), in support of their request of a short fourteen-day extension from June 23, 2023 to July 7, 2023 to file their opposition to the request for a preliminary injunction filed by Plaintiffs, David B. Means, Ryan Dupree, Robert G. Burford, Robert Gross, Mary L. Salley, Martha Trisler, John F. Pearce, Joe Cobb, Jack L. Buford, Jack E. Barron, W. Bruce Garlington, Donald Barber, Billy Dwayne Brumley, and Sherry Brumley (collectively “**Plaintiffs**”).

Plaintiffs filed an opposition to Defendants’ request for the short extension arguing that the extension “would cause undue delay due to the ‘time-sensitive issues’ of this case.” Plaintiffs’ Opp. p. 2. Plaintiffs further suggest that the Defendants have somehow caused delay. *Id.* at p. 3.

If there is any delay in this matter, it is of the Plaintiffs’ own making. The Plaintiffs’ First Amended Complaint, which was filed on May 25, 2023, repeats many of the arguments the Plaintiffs wrote in a letter on February 3, 2023, objecting to the plan that was ultimately enacted (the “**Enacted Plan**”). Amended Complaint, ¶47. The Amended Complaint then states in Paragraph 55 that the Enacted Plan was adopted on April 10, 2023.

Plaintiffs then waited over six weeks to file its Amended Complaint after the Enacted Plan was adopted and nearly four months after it objected to the Enacted Plan on February 3,

2023. Plaintiffs have shown no urgency to act quickly when it requires their own actions yet they are now attempting to deny Defendants reasonable time to respond to their lengthy and complex memorandum in support of their request for a preliminary injunction.

The short two week extension requested by Plaintiffs through July 7, 2023 is needed to sufficiently respond to Plaintiffs' Amended Motion for Preliminary Injunction given the length of Plaintiffs' Preliminary Memorandum and Exhibits thereto, the complexity and fact intensive nature of its arguments, and other pressing matters facing undersigned counsel. Undersigned counsel were just retained by the Defendants last week on June 12th. No hearing on the preliminary injunction has even been scheduled yet. Given Plaintiffs' own delay in filing their Amended Complaint, they certainly should not be in a position to object to a short two-week extension for Defendants to respond.

WHEREFORE, Defendants, DeSoto Parish and the DeSoto Parish Police Jury, respectfully request that its Motion be granted and that they are allowed additional 14 days from June 23, 2023 to and through July 7, 2023 to file an opposition brief to Plaintiffs' Request for Preliminary Injunction.

RESPECTFULLY SUBMITTED,

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