

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

TERRY PETTEWAY, THE
HONORABLE DERRECK ROSE,
and PENNY POPE,

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS,
and HONORABLE MARK HENRY,
in his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-57

UNITED STATES OF AMERICA,

Plaintiff,

v.

GALVESTON COUNTY, TEXAS,
GALVESTON COUNTY
COMMISSIONERS COURT, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-93

DICKINSON BAY AREA BRANCH
NAACP, GALVESTON BRANCH
NAACP, MAINLAND BRANCH
NAACP, GALVESTON LULAC
COUNCIL 151, EDNA COURVILLE,
JOE A. COMPIAN, and LEON
PHILLIPS,

Civil Action No. 3:22-cv-117

<i>Plaintiffs,</i>	§
	§
v.	§
	§
GALVESTON COUNTY, TEXAS,	§
HONORABLE MARK HENRY, in	§
his official capacity as Galveston	§
County Judge, and DWIGHT D.	§
SULLIVAN, in his official capacity as	§
Galveston County Clerk	§
	§
<i>Defendants.</i>	§

OPPOSITION TO DEFENDANTS’ MOTION FOR EXTENSION OF TIME

Plaintiffs, Terry Petteway, the Honorable Derreck Rose, and Penny Pope (the “Petteway Plaintiffs”); Plaintiff United States of America; and Plaintiffs Dickinson Bay Area Branch NAACP, Galveston Branch NAACP, Mainland Branch NAACP, Galveston LULAC Council 151, Edna Courville, Joe A. Compian, and Leon Phillips (the “NAACP Plaintiffs”) oppose Defendants’ Motion for an Extension (the “Motion”).

Under normal circumstances, Plaintiffs would not oppose an extension—and have agreed to other extensions in the course of this litigation. However, given the sensitive nature of this action, *see, e.g.*, ECF 40 (Order Denying Motion To Stay), any delay could cause prejudice. Additionally, the Court originally proposed initial briefing by September 1, 2023, but provided an additional week to allow Defendants to finalize their briefing and Plaintiff groups to endeavor to coordinate on one consolidated set of proposed findings and conclusions. Accordingly, Plaintiff groups collaborated and worked diligently over the holiday weekend to ensure that they are ready to file their single, Joint Proposed Findings

of Fact and Conclusions of Law and separate Closing Briefs by September 8, 2023.

Therefore, Plaintiffs oppose the Motion.

In the alternative, if an extension is granted, Plaintiffs request that the extension only be until Monday, September 11, 2023 at 5 p.m. for Proposed Findings of Fact and Conclusions of Law and Closing Briefs and that the September 15, 2023 deadline for Response Briefs remains in effect.

Respectfully submitted this 6th day of September, 2023,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 6th, 2023, the foregoing document, its appendix, and its exhibits were filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Hilary Harris Klein