

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

DYAMONE WHITE; DERRICK SIMMONS;
TY PINKINS; CONSTANCE OLIVIA
SLAUGHTER HARVEY-BURWELL,

Plaintiffs,

vs.

STATE BOARD OF ELECTION
COMMISSIONERS; TATE REEVES *in his
official capacity as Governor of Mississippi*;
LYNN FITCH *in her official capacity as
Attorney General of Mississippi*; MICHAEL
WATSON *in his official capacity as
Secretary of State of Mississippi.*

Defendants.

4:22-cv-00062-MPM-JMV

**JOINT MOTION FOR EXTENSION OF DEADLINES REGARDING DEFENDANTS’
MOTION FOR PAYMENT OF FEES AND COSTS**

Plaintiffs Dyamone White, Derrick Simmons, Ty Pinkins, and Constance Olivia Slaughter Harvey-Burwell (“Plaintiffs”), and Defendants State Board Of Election Commissioners, Tate Reeves, Lynn Fitch, and Michael Watson (“Defendants,” together with Plaintiffs, the “Parties”) respectfully submit this joint motion to extend the Parties’ deadlines for briefing related to Defendants’ Motion for Payment of Fees and Costs Actually Incurred as a Result of Plaintiffs’ Improper Expert Rebuttal Disclosures (the “Motion”), Doc. No. 166, filed in this Court on November 21, 2023. In support, the Parties state as follows:

1. Pursuant to Local Uniform Civil Rule 7(b)(4), Plaintiffs' opposition to the Motion is due within fourteen (14) days after service of the Motion, or by December 5, 2023, and Defendants' reply in support of the Motion is due within seven (7) days thereafter, or by December 12, 2023.
2. Counsel for the Parties have conferred and agreed to the following briefing schedule, extending each side's deadlines to respond by fourteen (14) days as compared with the default deadlines applicable under Local Uniform Civil Rule 7(b)(4):
 - a. Plaintiffs' response in opposition to the Motion shall be submitted by not later than December 19, 2023; and
 - b. Defendants' reply in support of the Motion shall be submitted by not later than January 9, 2024.
3. This motion is not brought for the purposes of delay, and the requested relief will not prejudice any Party.
4. Due to the straightforward nature of the relief sought by this motion, the Parties respectfully request that they not be required to submit a separate memorandum in support of this motion as required by Local Uniform Civil Rule 7(b)(4).

WHEREFORE, the Parties respectfully request that the Court enter a Scheduling Order extending the deadlines regarding the Motion as set forth above.

THIS the 1st day of December, 2023.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Jonathan K. Youngwood, hereby certify that on December 1, 2023, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all parties on file with the Court.

/s/ Jonathan K. Youngwood
Jonathan K. Youngwood