

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FIFTH CIRCUIT

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No. 22-30320

RONALD CHISOM; MARIE BOOKMAN, ALSO KNOWN AS GOVERNOR;  
URBAN LEAGUE OF LOUISIANA,

Plaintiffs-Appellees

UNITED STATES OF AMERICA; BERNETTE J. JOHNSON,

Intervenor Plaintiffs-Appellees

v.

STATE OF LOUISIANA, EX REL, JEFF LANDRY, ATTORNEY GENERAL,

Defendant-Appellant

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA

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UNITED STATES' UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO FILE ITS RESPONSE TO APPELLANT'S PETITION FOR REHEARING  
EN BANC

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The United States respectfully moves, pursuant to Federal Rule of Appellate Procedure 26(b) and Fifth Circuit Rule 26.2, for a ten-day extension of time to file its response to defendant-appellant's petition for rehearing en banc. Defendant-appellant does not oppose this motion. The reasons for this motion are set forth below.

1. On October 25, 2023, this Court issued the opinion in this case, affirming the district court's denial of defendant-appellant's motion to dissolve a consent decree.

2. Defendant-appellant filed a petition for rehearing en banc on November 8, 2023. On November 9, this Court requested a response to the petition for rehearing en banc by November 20, 2023. With the unopposed, ten-day extension, the United States' response would be due November 30, 2023.

3. A ten-day extension is necessary in light of other briefing responsibilities and pre-scheduled personal travel of undersigned counsel.

4. Furthermore, this modest extension of time is needed to permit sufficient time for the government to complete its multi-layered internal review process once undersigned counsel carefully reviews the petition and prepares the United States' response.

5. This motion is made in good faith and not for the purpose of delay.

6. Defendant-appellant does not oppose this motion. The private plaintiffs-appellees also do not oppose this motion.

WHEREFORE, the United States respectfully requests that this Court grant its unopposed motion for a ten-day extension of time to file its response to appellant's petition for rehearing en banc.

Respectfully submitted,

KATHLEEN P. WOLFE  
Deputy Assistant Attorney General

s/ Yael Bortnick  
ERIN H. FLYNN  
Yael BORTNICK  
Attorneys  
U.S. Department of Justice  
Civil Rights Division  
Appellate Section  
Ben Franklin Station  
P.O. Box 14403  
Washington, D.C. 20044-4403  
(202) 616-8271

## CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2023, I electronically filed the foregoing UNITED STATES' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE ITS RESPONSE TO APPELLANT'S PETITION FOR REHEARING EN BANC with the Clerk of the Court for the United States Court of Appeals for the Fifth Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

s/ Yael Bortnick  
Yael BORTNICK  
Attorney

## CERTIFICATE OF COMPLIANCE

I hereby certify that this motion complies with the type-volume limitation imposed by Federal Rules of Appellate Procedure 27(d)(2)(A) and 32(c)(1) because, excluding the parts of the document exempted by Federal Rule of Appellate Procedure 32(f), this motion contains 239 words. This motion complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word for Microsoft 365 in Times New Roman, 14-point font.

s/ Yael Bortnick  
YAEL BORTNICK  
Attorney

Date: November 13, 2023