

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

TURTLE MOUNTAIN BAND OF CHIPPEWA
INDIANS, et al.,

Plaintiffs,

Civil No. 3:22-cv-00022-PDW-ARS

v.

MICHAEL HOWE, in his official capacity as
Secretary of State of North Dakota, et al.,

Defendant.

**CONSENT MOTION TO ENTER AGREED ORDER EXTENDING TIME TO FILE
APPLICATIONS FOR ATTORNEYS' FEES**

Plaintiffs respectfully move for an extension of time to file a motion for attorneys' fees, expenses, and costs from Defendants pursuant to Fed. R. Civ. P. 54.1, 28 U.S.C. § 1920, 52 U.S.C. § 10310(e), and 42 U.S.C. § 1988. Plaintiffs request that an extension be granted until after the resolution of any appeal or after the time for any appeal has expired. Plaintiffs propose to file a status report within 10 days of resolution of any appeal.

Counsel for Defendants consents to the requested extension.

November 27, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing was served on all counsel of record via the Court's CM/ECF system.

/s/ Mark P. Gaber

Mark P. Gaber

Counsel for Plaintiffs

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**[PROPOSED] ORDER GRANTING MOTION TO EXTEND DEADLINE TO SUBMIT
APPLICATION FOR ATTORNEYS' FEES**

Upon consideration of Plaintiffs' Consent Motion to Extend the Deadline to Submit an Application for Attorneys' Fees pursuant to Rule 54.1, it is hereby **ORDERED** that the Motion is **GRANTED**. It is further **ORDERED** that the deadline for Plaintiffs to submit attorneys' fees is suspended until after the resolution of any appeal, or after the time for any appeal has expired. Plaintiffs shall file a status report within 10 days of the resolution of any appeal.

Dated: November __, 2023

The Honorable Peter D. Welte, Chief Judge
United States District Court for the District of North Dakota