

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT**

THE HONORABLE REVEREND : APPEAL NO. 23-3910  
KENNETH L. SIMON, ET AL :  
 :  
 PLAINTIFFS-APPELLANTS :  
 :  
 :  
 VS. :  
 :  
 GOVERNOR MIKE DEWINE, ET AL. :  
 :  
 DEFENDANTS-APPELLEES. :

**SECOND MOTION OF APPELLANTS TO EXTEND TIME FOR FILING REPLY  
BRIEF**

In accordance with the provisions of 6<sup>th</sup> Cir. Rule 26(a)(1) Appellants respectfully move this Court for an extension until March 21, 2024, to file the Reply brief.

The Reply brief is currently due February 29, 2024. Additional time is needed to complete preparation of the brief for the reason this dispute involves several novel issues, whether Black voters who comprise less than a majority in a single member legislative district have rights that are cognizable under §2 of the Voting Rights Act, 52 U.S.C. §10301, et seq., and whether there is a private right of action under the Voting Rights Act. These are issues of first impression in the Sixth Circuit.

This request is not interposed for purposes of delay. Appellants have requested one previous extension of the Reply brief filing date.

/s/ Percy Squire  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served by operation of the electronic filing system, on February 27, 2024.

/s/ Percy Squire  
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