

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
RODERICK WEBBER,)	
)	
Plaintiff)	
)	
v.)	Case No. 1:18-cv-00931-LM
)	
EDWARD DECK, ET AL.,)	
)	
Defendants)	
_____)	

**MOTION TO EXTEND TIME TO
ANSWER PLAINTIFF’S SECOND AMENDED COMPLAINT**

Defendants Donald J. Trump for President, Inc., Edward Deck, XMark, LLC, and Rep. Fred Doucette (collectively the “Campaign Defendants”), hereby move the court to extend the deadline to respond to the Plaintiff’s Second Amended Complaint to April 8, 2020. The Plaintiff has not assented to or expressed an objection to the relief sought in this motion, which rests on the following grounds.

1. Following the Court’s orders on multiple defendants’ motions to dismiss, the Campaign Defendants are required to file an answer to the remaining claims in Plaintiff’s Second Amended Complaint (Doc. No. 75).

2. Due to a significant disruption in the Campaign Defendants’ counsel’s law firm operations because of the rapid onset of the COVID-19 pandemic, and the attendant delays as the firm and its attorneys have transitioned to a remote workplace, the Campaign Defendants require additional time to finalize their answer to the Plaintiff’s extremely detailed complaint.

3. The Campaign Defendants submit that due to the unprecedented circumstances of the COVID-19 pandemic, good cause exists to extend their answer deadline. Moreover, the

requested extension will not prejudice the parties or otherwise affect the trial schedule, as the Court has not yet issued a discovery plan or set a trial date and other case deadlines.

4. Accordingly, the Campaign Defendants respectfully request that their deadline to file an answer to Plaintiff's Second Amended Complaint be extended to Wednesday, April 8, 2020.

5. Pursuant to Local Rule 7.1(c), the Campaign Defendants certify that their undersigned counsel reached out to the Plaintiff by e-mail on April 1, 2020, to seek his concurrence to the relief sought in this motion. As of the date of filing, the Plaintiff has not responded to undersigned counsel's e-mail.

WHEREFORE, the Campaign Defendants respectfully request that the Court grant this motion and extend their deadline to answer the Plaintiff's Second Amended Complaint to April 8, 2020.

Respectfully submitted,

Donald J. Trump for President, Inc.,
Edward Deck, XMark, LLC,
and Rep. Fred Doucette,

By Their Attorneys,

Date: April 3, 2020

/s/ Bryan K. Gould
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CERTIFICATE OF SERVICE

I hereby certify that the within pleading is being served electronically upon the persons listed below through the court's ECF system.

Christian Hinrichsen, Esq.
Samantha D. Elliott, Esq.
Adam B. Pignatelli, Esq.
Jonathan S. Spaeth, Esq.
Peter Cowan, Esq.
Chloe F. Golden, Esq.
Roderick Webber (pro se)

Date: April 3, 2020

/s/ Bryan K. Gould
Bryan K. Gould, Esq.