

(4) The undersigned counsel for Plaintiff is preparing for an administrative trial that will take up most of the week of August 21, 2023, and has a wide variety of other pressing work obligations as well.

(5) Given the number of issues and parties involved and the work schedule of his counsel, Plaintiff respectfully requests a brief ten-day extension until August 31, 2023, to file his response to the motion to dismiss.

(6) Plaintiff's counsel has conferred with counsel for Defendants concerning the relief requested in this Motion, and counsel for Defendants indicated that he is unopposed to that relief.

(7) Neither party will suffer prejudice from this brief extension of time.

(8) The relief requested in this unopposed motion is not sought for purposes of delay, but only so that justice may be done.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this Motion thereby extending the deadline for Plaintiff to respond to Defendants' motion to dismiss until August 31, 2023.

DATED: August 17, 2023

Respectfully submitted,

/s/ Mark Whitburn
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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel of record for Defendants, Jason T. Contreras, by electronic mail on August 17, 2023, regarding the relief requested in the foregoing Motion and that Mr. Contreras indicated that the requested relief was unopposed.

/s/ Mark Whitburn

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on counsel of record for Defendants on August 21, 2023, through the electronic filing service as follows:

Jason T. Contreras
Assistant Attorney General
Office of the Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

/s/ Mark Whitburn