

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

CARA WESSELS WELLS,
Plaintiff

v.

TEXAS TECH UNIVERSITY, SAMUEL
PRIEN, LINDSAY PENROSE,
Defendants.

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CAUSE NO. 5:23-CV-00060-H

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S ORIGINAL COMPLAINT**

Defendants Texas Tech University, Dr. Samuel D. Prien, and Dr. Lindsay Penrose (collectively "Defendants") file this unopposed motion seeking to extend the deadline to respond to Plaintiff Cara Wessels Wells's Complaint [Dkt.1].

1. Plaintiff filed her Original Complaint on March 22, 2023.
2. Defendant TTU was served with Plaintiff's Original Complaint on March 28, 2023, and the deadline to file a responsive pleading is due April 18, 2023.
3. Defendants Dr. Prien and Dr. Penrose were served on March 29, 2023, and the deadline to file a responsive pleading is April 19, 2023.
4. The Office of the Attorney General has recently been retained to represent Defendants in this matter, and accordingly additional time is needed to adequately prepare a defense.
5. Defendants' Counsel consulted with Plaintiff's Counsel, and Plaintiff agrees to an extension of time.
6. This motion is not filed for the purposes of delay but only to ensure that the briefing filed with the Court is appropriate and will assist the Court in the resolution of the pending matter.

WHEREFORE, Defendants respectfully request the Court to grant a 30-day extension to respond to Plaintiff's Original Complaint, or by May 18, 2023.

Dated April 5, 2023

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General
SHAWN COWLES
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON
Chief for General Litigation Division

/s/ Kirstin M. Erickson
KIRSTIN M. ERICKSON
Texas Bar No. 24134194
Assistant Attorney General

Office of the Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, TX 78711-2548
(512) 463-2120
(512) 320-0667 FAX
kirstin.erickson@oag.texas.gov

COUNSEL FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that Kirstin Erickson, Counsel for Texas Tech University, conferred with Ramon Hernandez, counsel for Plaintiff, via email on April 4, 2023, on the matter in this motion. Mr. Hernandez stated that Plaintiff is unopposed.

/s/ Kirstin M. Erickson
KIRSTIN M. ERICKSON

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record on April 5, 2023, via the court's electronic filing system.

/s/ Kirstin M. Erickson
KIRSTIN M. ERICKSON