UNITED STATES DISTRICT COURT
SOUTHERN DISTRT OF IOWA

THE ARC OF IOWA, et al.,

Plaintiffs,

v.

KIM REYNOLDS, et al.,

Defendants.

Case No. 4:21-cv-264

UNRESISTED MOTION TO EXTEND/STAY DEADLINE TO FILE MOTION FOR ATTORNEY'S FEES AND COSTS

COME NOW, Plaintiffs, by and through undersigned counsel, and respectfully request an extension to file for their Motion for Attorney's Fees and/or request that the deadline for such Motion be stayed pending the outcome of the appeal filed in this matter, and in support thereof state as follows:

1. This is Plaintiffs' first request for an extension of time and stay of deadline concerning the Motion for Attorney's Fees and Costs.
2. Judgment was entered by the court on November 2, 2022. ECF 115.
3. Defendants then filed a Notice of Appeal on November 2, 2022. ECF 116.
4. Under F.R.C.P. 54(d)(2) a party must file their motion for attorneys' fees within 14 days of the entry of judgment.
5. Plaintiffs' Motion for Attorneys' Fees is currently due on November 16, 2022.
6. To conserve party and judicial resources and avoid the potential need for successive motions, Plaintiffs request an extension/stay of the deadline to file their Motion for Attorneys' Fees pending the outcome of the appeal.

7. Counsel for all Defendants have indicated they have no objection to this motion.

WHEREFORE, Plaintiffs respectfully move for an extension/stay of the deadline to file a motion for attorney's fees and costs pending the outcome of the appeal.

Respectfully submitted,

AMERICAN CIVIL LIBERTIES UNION OF IOWA

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Attorneys for the Plaintiffs

Dated: November 10, 2022

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing paper with the Clerk of Court by using the CM/ECF system.

All participants in this case are registered CM/ECF users and will served by the CM/ECF system.

Date: November 10, 2022
/s/Shefali Aurora
Shefali Aurora