

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

COUNTY OF MECKLENBURG

2021 APR 27 P 1:28

21-CVS-4063

MECKLENBURG CO. CLERK

ROBERT WRIGHT, MARK MICHALEC,  
and SCOTT SHIPMAN, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

CITY OF CHARLOTTE,

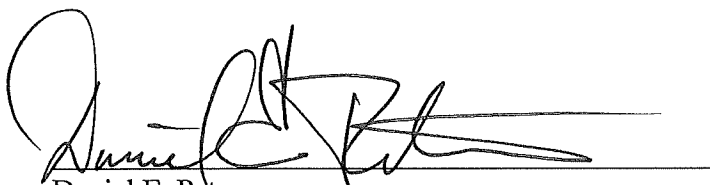
Defendant.

**DEFENDANT'S MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFFS' COMPLAINT**

Pursuant to Rules 6(b) and 12(a)(1) of the North Carolina Rules of Civil Procedure, Defendant City of Charlotte ("Defendant"), by and through undersigned counsel, hereby moves the Court for a 30-day extension of time up to by which to answer or otherwise respond to the Complaint filed in the above-captioned matter.

Defendant shows unto the Court that it was served on or about **Wednesday, March 31, 2021**. Computing time under N.C. R. Civ. P. 6(a), the answer or response to the Complaint would be due on **April 30, 2021**. While time has not yet expired for responding to the Complaint, additional time is needed for the preparation of a response thereto. Therefore, Defendant respectfully moves the Court for a thirty (30) day extension of time, to and through **May 31, 2021**, within which to serve an answer or to otherwise respond to the Complaint.

This 27<sup>th</sup> day of April, 2021.



Daniel E. Peterson  
N.C. State Bar No. 41521  
[danielpeterson@parkerpoe.com](mailto:danielpeterson@parkerpoe.com)

**PARKER POE ADAMS AND BERNSTEIN LLP**  
620 S. Tryon Street, Suite 800  
Charlotte, NC 28202  
Telephone: (704) 372-9000  
Facsimile: (704) 334-4706  
*Attorney for Defendant City of Charlotte*

**CERTIFICATE OF SERVICE**

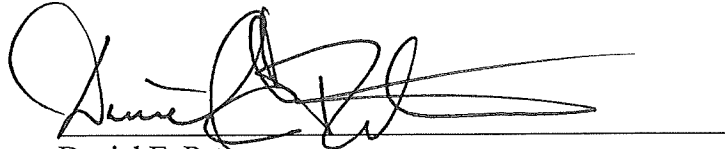
This is to certify that on this date I served the foregoing via email and by depositing a copy thereof in the United States mail, postage prepaid, upon the following:

Daniel R. Taylor, Jr., Esq.  
E. Winslow Taylor, Esq.  
Taylor & Taylor Attorneys at Law PLLC  
418 N. Marshall St., Suite 204  
Winston-Salem, NC 27101  
[dantaylor@t2legal.com](mailto:dantaylor@t2legal.com)  
[winslow@t2legal.com](mailto:winslow@t2legal.com)

W. Ellis Boyle, Esq.  
Knott & Boyle, PLLC  
4800 Six Forks Road, Suite 100  
Raleigh, NC 27609  
[ellis@knottboyle.com](mailto:ellis@knottboyle.com)

*Attorneys for Plaintiff*

This 27<sup>th</sup> day of April, 2021.



Daniel E. Peterson  
N.C. State Bar No. 41521  
[danielpeterson@parkerpoe.com](mailto:danielpeterson@parkerpoe.com)  
**PARKER POE ADAMS AND BERNSTEIN LLP**  
620 S. Tryon Street, Suite 800  
Charlotte, NC 28202  
Telephone: (704) 372-9000  
Facsimile: (704) 334-4706  
*Attorney for Defendant City of Charlotte*

STATE OF NORTH CAROLINA  
COUNTY OF MECKLENBURG

2021 APR 27 P 1:28

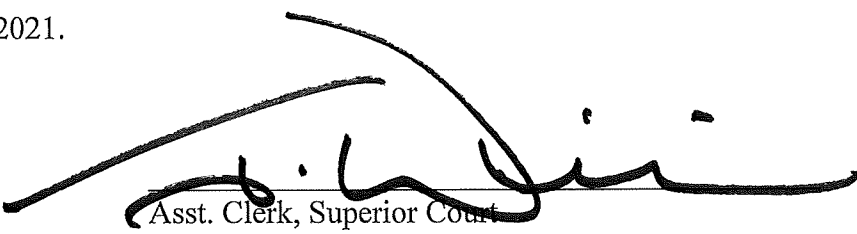
IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
21-CVS-4063

ROBERT WRIGHT, MARK MICHALEC,  
and SCOTT SHIPMAN, individually and on  
behalf of all others similarly situated,  
  
Plaintiffs,  
  
v.  
  
CITY OF CHARLOTTE,  
  
Defendant.

**ORDER GRANTING  
DEFENDANT'S MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFFS' COMPLAINT**

UPON CONSIDERATION of Defendant City of Charlotte's Motion for Extension of Time to Respond to Plaintiffs' Complaint, it is hereby **ORDERED** that the Motion is **GRANTED** and the time for Defendant City of Charlotte to respond to Plaintiff's Complaint is hereby extended up to and including **May 31, 2021**.

This 27 day of April, 2021.



Asst. Clerk, Superior Court  
Mecklenburg County, North Carolina