

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

~~FILED~~
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

2021 JUL 28 P 2:20 21-CVS-4063

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

MECKLENBURG CO., C.S.C.

BY _____

Plaintiffs,

v.

CITY OF CHARLOTTE,

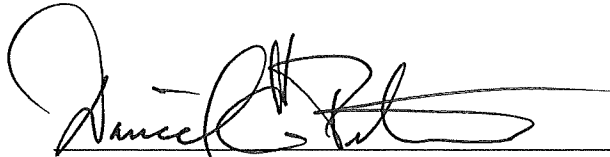
Defendant.

**DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 6(b) and 34(b) 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 Plaintiffs' Second Request for Production of Documents filed in the above-captioned matter.

Defendant shows unto the Court that it was served with Plaintiffs' Second Request for Production of Documents on or about **Tuesday, July 13, 2021**. Accordingly, Defendant has thirty (30) days in which to respond to the Plaintiffs' Second Request for Production of Documents. Thus, computing time under N.C. R. Civ. P. 6(a), responses to the Plaintiffs' Second Request for Production of Documents would be due on **August 12, 2021**. While time has not yet expired for responding to the Plaintiffs' Second Request for Production of Documents, 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 **September 13, 2021**, within which to serve responses to the Plaintiffs' Second Request for Production of Documents.

This 28th day of July, 2021.



Daniel E. Peterson

N.C. State Bar No. 41521

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

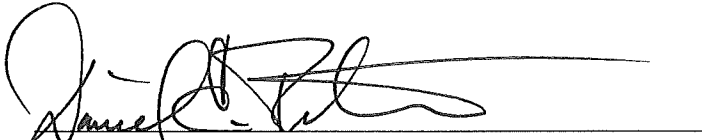
This is to certify that on this date I served the foregoing via email and by depositing a copy thereof in the United States mail, postage prepaid, upon the following:

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
winslow@t2legal.com

W. Ellis Boyle, Esq.
Knott & Boyle, PLLC
4800 Six Forks Road, Suite 100
Raleigh, NC 27609
ellis@knottboyle.com

Attorneys for Plaintiff

This 26th day of July, 2021.



Daniel E. Peterson
N.C. State Bar No. 41521
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

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

2021 JUL 28 P 2:20

ROBERT WRIGHT, MARK MICHAEL
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' PLAINTIFFS'
SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS**

UPON CONSIDERATION of Defendant City of Charlotte's Motion for Extension of Time to Respond to Plaintiffs' Second Request for Production of Documents, it is hereby **ORDERED** that the Motion is **GRANTED** and the time for Defendant City of Charlotte to respond to Plaintiff's Plaintiffs' Second Request for Production of Documents is hereby extended up to and including **September 13, 2021**.

This 28 day of July, 2021.


Assistant Clerk, Superior Court
Mecklenburg County, North Carolina