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Attorney(s) for Defendants Brian Gamotis; Heather Gamotis; Daniel Edward Johnson; Shirley Ann Johnson; John Floyd Kidney; Brian J. Keeney; Debbie Lynne; Kelly Diane Rawlings; Dean Mark Rodgers; Steven Douglas Simonson, and Clinton J. Sparks

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

RACHEL MCCART AND ERIN MCCART,

Case No. 3:17-CV-00927-AC

Plaintiffs,

v.

**DEFENDANTS' UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
FILE RESPONSE TO PLAINTIFFS'  
FIRST AMENDED COMPLAINT**

CLIFFORD BEDDOW ET AL.,

Defendants.

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**LR 7.1 CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1, undersigned counsel J. Clay McCaslin, attorney for defendants Brian Gamotis, Heather Gamotis, Daniel Edward Johnson, Shirley Ann Johnson, Brian J. Keeney, John Floyd Kidney, Debbie Lynne, Steven Douglas Simonson, Kelly Diane Rawlings, Dean Mark Rodgers, and Clinton J. Sparks, and hereby certifies that he has conferred with plaintiff Rachel McCart, and that plaintiffs do not oppose the requested extension of time from November 6, 2017 until December 6, 2017 to file a response to Plaintiffs' Amended Complaint.

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RESPONSE TO PLAINTIFFS' FIRST AMENDED COMPLAINT

**MOTION**

NOW INTO COURT come defendants Brian Gamotis, Heather Gamotis, Daniel Edward Johnson, Shirley Ann Johnson, Brian J. Keeney, John Floyd Kidney, Debbie Lynne, Steven Douglas Simonson, Kelly Diane Rawlings, Dean Mark Rodgers, and Clinton J. Sparks, pursuant to Fed. R. Civ. P. 6(b), and request that the Court grant a thirty (30)-day extension, from November 6, 2017 to December 6, 2017, for the above-named defendants to file a response to plaintiffs' First Amended Complaint in this case.

The parties have reached a global settlement and resolution of all claims in this case. The parties simply need additional time to finalize the details of the settlement and submit a judgment of dismissal as to all of plaintiffs' claims against all defendants in this case.

Defendants request this extension in good faith, in accordance with Fed. R. Civ. P. 6(b), and not for any dilatory or otherwise improper purpose.

DATED this 31st day of October, 2017.

By: /s/ J. Clay McCaslin  
J. Clay McCaslin OSB #041684  
Attorney for Defendants Brian Gamotis,  
Heather Gamotis, Daniel Edward Johnson,  
Shirley Ann Johnson, Brian J. Keeney,  
John Floyd Kidney, Debbie Lynne, Steven  
Douglas Simonson, Kelly Diane Rawlings,  
Dean Mark Rodgers, and Clinton J. Sparks