

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

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|--|---|----------------------------|
| MARTHA GONZALEZ, individually and on behalf of all others similarly situated, | § | |
| | § | |
| | § | |
| Plaintiffs, | § | CAUSE NO. 1:18-cv-00169-LY |
| | § | |
| v. | § | |
| | § | |
| CORECIVIC, INC., | § | |
| | § | |
| Defendant. | § | |

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFFS' COMPLAINT**

Defendant CoreCivic, Inc., through counsel, respectfully requests an extension of time, until May 18, 2018, in which to file its response to Plaintiffs' Complaint (Doc. 1). A responsive pleading is currently due by April 11, 2018. An extension is needed to thoroughly review and respond to the approximately 140-paragraph Complaint, which seeks class certification and raises federal and state law claims. Counsel for Plaintiffs do not oppose this request.

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Dated: April 5, 2018

Respectfully submitted,

/s/ Daniel P. Struck

Daniel P. Struck (*pro hac vice*)

Rachel Love (*pro hac vice*)

Ashlee B. Hesman (*pro hac vice*)

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Attorneys for Defendant CoreCivic, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

| | |
|------------------------|--|
| Thomas H. Padgett, Jr. | tpadgett@buenkerlaw.com |
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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

N/A

/s/ Daniel P. Struck

Daniel P. Struck

Certificate of Conference

On the 4th day of April 2018, undersigned counsel conferred with opposing counsel concerning the relief sought in this Motion and was advised that opposing counsel did not oppose this Motion.

/s/ Daniel P. Struck

Daniel P. Struck

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