IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)

WHEELABRATOR BALTIMORE, L.P., et al.	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No. 1:19-CV-01264-GLR
	*	
MAYOR AND CITY COUNCIL OF BALTIMORE	*	
	*	
Defendant.	*	
	*	

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MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendant Mayor and City Council of Baltimore (the "City of Baltimore"), pursuant to L.R. 105.9, moves to extend the time to respond to Plaintiffs' Complaint by two months, through and including Monday, July 22, 2019, and states as follows:

1. On April 30, 2019, Plaintiffs filed their Complaint in this action.

2. On May 1, 2019, Plaintiffs effected service of process on the City of Baltimore. The date by which the City of Baltimore must answer or otherwise respond to the Complaint is May 22, 2019. Fed. R. Civ. P. 12(a)(i).

3. The Complaint, filed on behalf of five Plaintiffs, alleges eleven causes of action, comprises 57 pages, and includes approximately 300 additional pages of exhibits.

4. It is well-publicized that in the last week the City of Baltimore has been the victim of a cyber-attack, which has impeded the ability of the City Law Department to respond to the Complaint. At this time, the City of Baltimore does not know when its computer capabilities will be fully restored.

5. The requested extension will not prejudice any party. The Complaint challenges an ordinance passed by the City Council on February 11, 2019 and signed by the Mayor on March 7, 2019. The Plaintiffs took two months to prepare the complaint, and the City of Baltimore should be allowed a commensurate amount of time to respond thereto.

6. Assistant City Solicitor Tom Webb has conferred with Roy Prather, Esquire, attorney for the Plaintiffs, and requested that Plaintiffs consent to a 60-day extension of time for the City of Baltimore to respond to the Complaint. Mr. Prather confirmed by email that the Plaintiffs consent to the requested extension.

7. For these reasons, the City of Baltimore respectfully requests a two-month extension—through and including Monday, July 22, 2019—to answer or otherwise respond to Plaintiff's Complaint.

Dated: May 16, 2019

Respectfully submitted,

/S/

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