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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

BRIAN P. CARR,

Civil No. 08-398-HA

PLAINTIFF,

v.

State of Oregon, through **Hardy Myers** in his official capacity as Attorney General of the State of Oregon and the **City of Portland** through **Linda Meng** in her official capacity as City Attorney for the City of Portland,

**DEFENDANTS' UNOPPOSED MOTION
FOR EXTENSION OF TIME FOR
COMPLETION OF DISCOVERY, FILING
DISPOSITIVE MOTIONS AND
LODGING PRETRIAL ORDER**

DEFENDANTS.

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendant City of Portland moves this Court for an extension of the dates listed in the Civil Minutes issued by the Court dated March 31, 2008.

The parties have conferred regarding this motion, and all parties consent to and join in this motion. LR 7.1.

Specifically, defendant requests an order:

1. Allowing a sixty-day extension of time from the issuance of the Court's ruling on

the Motions to Dismiss (currently under submission) to complete discovery; file dispositive motions, file all pleadings; join all claims, remedies and parties; and

2. Allowing a ninety-day extension of time from the issuance of the Court's ruling on the Motions to Dismiss to lodge the Pretrial Order.

This motion is based upon the complete court file and upon the Affidavit of Tracy Pool Reeve filed herewith.

Dated this 29th day of July, 2008.

Respectfully submitted,

/s/ Tracy Pool Reeve

TRACY POOL REEVE, OSB #89112
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME FOR COMPLETION OF DISCOVERY, FILING DISPOSITIVE MOTIONS AND LODGING PRETRIAL ORDER on:

BRIAN CARR
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Pro Se Plaintiff

JOSEPH G. GROSHONG
ASSISTANT ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
TRIAL DIVISION
1162 COURT STREET NE
SALEM, OR 97301-4096
Of Attorneys for Defendant State of Oregon

on July 29, 2008, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said *pro se* plaintiff and said attorney, to be sent by the following method(s):

- to Plaintiff by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- by **hand-delivery**.
- by **email** pursuant to LR 5.2(b) and/or in accordance with the Court's April 29, 2008, order (docket No. 10).
- by **facsimile transmission**.

/s/ Tracy Pool Reeve
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