

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA  
2006 JAN 11 PM 2:02  
LORETTA G. WHYTE  
CLERK

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

*****	*	*****
<b>PATRICIA L. KONIE</b>		<b>CIVIL ACTION</b>
<b>Plaintiff</b>	*	
		<b>NUMBER 05-6310</b>
	*	
<b>VERSUS</b>		<b>SECTION "F" (3)</b>
	*	
<b>THE STATE OF LOUISIANA, ET AL</b>		<b>JUDGE MARTIN L.C. FELDMAN</b>
<b>Defendants</b>	*	
		<b>MAGISTRATE DANIEL KNOWLES, III</b>
	*	
*****		*****

**MOTION FOR EXTENSION OF TIME TO PLEAD**

**NOW INTO COURT**, through the Louisiana Attorney General, come defendants, The State of Louisiana, through its Department of Public Safety and Corrections, Office of State Police (erroneously sued as separate entities) and The State of California, by and through The Department of California Highway Patrol (also erroneously sued as separate entities), who respectfully move this Honorable Court for an extension of time of twenty (20) days, within which to answer or otherwise plead to plaintiff's complaint.

No previous extensions of time have been requested by defendants, nor has any opposing party filed into the record an objection to an extension of time as to these defendants.


_____	Fee	_____
_____	Process	_____
<b>X</b>	Dktd	_____
<b>1</b>	CtRmDep	_____ 1
_____	Doc. No	_____

Furthermore, the undersigned respectfully notes that the filing of this Motion for Extension in no way constitutes an appearance, and none of the defenses available to defendants are hereby waived by the filing of this pleading.

**WHEREFORE**, Movers, The State of Louisiana, through its Department of Public Safety and Corrections, Office of State Police and The State of California, by and through The Department of California Highway Patrol respectfully request that an extension of time of twenty (20) days, from the date of this Court's Order, be granted for filing of responsive pleadings.

Respectfully Submitted,


**CHARLES C. FOTI, JR.**  
**ATTORNEY GENERAL**

BY: 

**LANCE S. GUEST (La. Bar #25403)**  
**Assistant Attorney General**  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing pleading has been forwarded to all counsel and/or pro se parties of record by placing same in the United States Mail, Postage prepaid and properly addressed, on this the 11<sup>th</sup> day of January, 2006.

  
**LANCE S. GUEST**