

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiffs,

v.

No. 1:14-cv-1025-RB-SMV

THE CITY OF ALBUQUERQUE,

Defendant,

v.

THE ALBUQUERQUE POLICE OFFICERS' ASSOCIATION,

Intervenor.

**MOTION FOR EXTENSION OF TIME TO SUBMIT THE CITY OF
ALBUQUERQUE'S REPORT AND ACTION PLAN**

COMES NOW, the Defendant, City of Albuquerque ("City"), through its undersigned counsel, and respectfully requests an extension of time of the deadline for the City's Report and Action Plan ("Action Plan"). As grounds for this motion, the Defendant states the following:

1. The current deadline for submission of the Action Plan is set for July 3, 2017.
2. The City's review of the United States', amici's, and stakeholders' feedback regarding the Action Plan indicates that more time is necessary to finalize the document.
3. Tuesday, July 4, 2017 is an observed holiday, where various staff pertinent to this matter will be on leave at times both before and after the holiday.
4. The City believes that two additional weeks would be appropriate and necessary to address the feedback received from the United States, amici, and stakeholders.

5. The Plaintiff, United States of America, concurs in this Motion and the relief requested herein.

6. Intervenor, The Albuquerque Police Officers' Association, concurs in this Motion and the relief requested herein.

7. The Monitor concurs in this Motion and the relief requested herein.

8. WHEREFORE, the City moves this Court for an Order to change the deadline from July 3, 2017 to July 17, 2017 so that the City is provided with sufficient time to finalize and submit the Action Plan.

Respectfully submitted,

CITY OF ALBUQUERQUE
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s/ Jeramy Schmehl

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Attorneys for Defendant City of

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Certificate of Service

I HEREBY CERTIFY that on the 30th day of June 2017, I filed the foregoing document entitled "Motion for Extension to Submit the City Of Albuquerque's Report and Action Plan" electronically through the CM/ECF system, which caused the parties, counsel of record and Independent Monitor on the service list to be served by electronic means.

/s/ Jeramy Schmehl
Jeramy Schmehl

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