

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

CIVIL ACTION NO.: 3:14-CV-577-RJC-DCK

US AIRLINE PILOTS
ASSOCIATION,

Plaintiff,

vs.

ROGER VELEZ, on behalf of himself
and all similarly situated former
America West Pilots, and
LEONIDAS, LLC,

Defendants.

**CONSENT MOTION FOR EXTENSION
OF TIME TO EXTEND PERIODS FOR
RESPONDING TO PLAINTIFF'S
MOTION TO REMAND AND TO REPLY
TO PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTIONS TO DISMISS**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, Defendants respectfully move the Court for an extension of time of fifteen (15) days, up to and including December 19, 2014, within which to respond to Plaintiff's Motion to Remand (the "Motion," Document 19) and reply to Plaintiff's Response to Defendants' Motions to Dismiss (the "Response," Document 21) in this matter. In support of this Motion, Defendants show the following:

1. Defendant's responses to Plaintiff's Motion and Response are currently due to be filed on December 4, 2014. Defendant has not previously requested an extension of time to respond to Plaintiff's Motion or Response.
2. Defendant is in need of additional time to prepare responses to the Plaintiff's Motion and Response.

3. Defendants request an extension of time of fifteen (15) days, through and including December 19, 2014, within which to prepare responses to Plaintiff's Motion and Response, with the understanding that Plaintiff's Motion for Discovery on Jurisdiction (Document 24), to which Defendants have not consented, requests that further briefing on Defendants' Motions to Dismiss (Documents 7 and 8) be stayed.

4. Pursuant to Local Rule 7.1, Defendants' counsel has consulted with Plaintiff's counsel and Plaintiff's counsel has consented to the request.

5. This Motion is made in good faith, for good cause, and not for the purposes of undue delay.

WHEREFORE, Defendants, with the consent of Plaintiff, respectfully request that the Court grant an extension of time, through and including December 19, 2014, for Defendants to prepare responses to Plaintiff's Motion and Response.

Respectfully submitted this the 3rd day of December, 2014.

/s/ C. Grainger Pierce, Jr.
C. Grainger Pierce, Jr. N.C. Bar No. 27305
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing pleading or paper to which this certificate is attached with the Clerk of Court using the CM/ECF system. In the event that notification pursuant to the CM/ECF system cannot be sent to counsel for the Plaintiff, I hereby certify that the foregoing document was duly served upon counsel for the Plaintiff in accordance with the provisions of Rule 5 of the Federal Rules of Civil Procedure by depositing it in the United States Mail, first-class postage prepaid, addressed as follows:

John Gresham
Tin Fulton Walker & Owen
301 East Park Avenue
Charlotte, NC 28203

This the 3rd day of December, 2014.

/s/ C. Grainger Pierce, Jr.
C. Grainger Pierce, Jr. N.C. Bar No. 27305
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