

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

JOHN ALAN SAKON	:	NO. 3:22-cv-00897 (AWT)
<i>Plaintiff</i>	:	
	:	
v.	:	
	:	
STATE OF CONNECTICUT	:	
<i>Defendant</i>	:	NOVEMBER 10, 2022

MOTION TO EXTEND TIME TO ANSWER

Pursuant to Local Rule 7(b), Defendant State of Connecticut, through its undersigned counsel, respectfully requests a thirty-day extension of the deadline to file its initial responsive pleading to December 19, 2022. This is Defendant's first request to extend this deadline. Defendant was served on October 27, 2022 at the Office of the Attorney General, its answer is therefore currently due November 17, 2022. Plaintiff does not consent to this motion for extension of time.

Defendant requests this extension because its undersigned counsel requires additional time to consult with her client and to research, draft and finalize a response to the Complaint. Plaintiff's Complaint alleges facts related to orders made in a state family court matter that involves over eight hundred docket entries spanning six years, including more than one hundred entries this year, with motions practice still ongoing. *See Sakon v. Sakon*, No. HHD-FA16-6071228-S (Conn. Super. Ct.), docket available at <https://civilinquiry.jud.ct.gov/CaseDetail/PublicCaseDetail.aspx?DocketNo=HHDF166071228S>.

Moreover, undersigned counsel is representing the State in multiple matters related to the November 8, 2022 election in state and federal court that have required participation

in oral argument since the Complaint in this case was served and have briefing deadlines this month. Those cases include *Lewis v. Kohler*, 3:22-cv-01225 (JBA), challenging the ballot access requirements for minor party candidates, in which undersigned counsel was required to brief and then participate in oral argument for a motion for preliminary injunction on November 1st and has a responsive pleading due on November 25, 2022. Undersigned counsel is also representing the State in *Soto v. Connecticut General Assembly*, HHD-CV-22-5075490-S, an expedited election contest case in state court challenging the validity of the constitutional referendum question that appeared on the ballot in Connecticut. Dispositive motions for that case are anticipated to be due in the next two weeks, with any trial occurring shortly thereafter.

Undersigned counsel is also representing the State in multiple appellate matters in state and federal court. See *Gottlieb v. Lamont*, No. 22-449 (2d Cir.); *Book v. Merrill*, No. AC 45782 (Conn. App. Ct.). Further, it is not yet known if additional cases will be brought related to the November 8th election. If brought those cases likely will be expedited election cases requiring rapid briefing by undersigned counsel.

Defendant respectfully submits that the foregoing establishes sufficient good cause to grant this modest extension of the Answer deadline. This case has been pending since July without any entries on the docket from July 25th until October 6th and service only occurring on October 27, 2022. Plaintiff has not yet filed a return of service. In comparison, a short four-week delay should not materially impact the management of this case or cause prejudice to any party or the Court.

For the foregoing reasons, Defendant requests that the deadline to file the responsive pleading to Plaintiff's Complaint be extended to December 19, 2022.

DEFENDANT,
STATE OF
CONNECTICUT

WILLIAM TONG
ATTORNEY
GENERAL

BY: /s/ Alma Rose Nunley
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CERTIFICATION

I hereby certify that on November 10, 2022, a copy of the foregoing was electronically filed. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Alma Rose Nunley
Alma Rose Nunley
Assistant Attorney General