

**METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE, JOHN
COOPER, in his official capacity as
Mayor of the Metropolitan Government
of Nashville and Davidson County,
Tennessee, and KEVIN CRUMBO, in
his official capacity as Finance Director
of the Metropolitan Government of
Nashville and Davidson County,
Tennessee,**

V.

Respondent/Appellant.

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

1. The Election Commission's Reply Brief was filed with the Court on November 16, 2021. On November 17, 2021, counsel for the Petitioners/Appellees contacted Election Commission's counsel to state that the Reply Brief was to have been filed on or before November 15, 2021, and to request that the Election Commission file a motion for enlargement of time. After being contacted by counsel for the Petitioners/Appellees, Election Commission's

counsel first determined that it mis-counted by one day the date on which the Reply Brief was to have been filed.

2. The filing of the Reply Brief on November 16, 2021, has not caused prejudice to any party or material delay in the appellate process.

3. Counsel for the Petitioners/Appellees has confirmed that the Petitioners/Appellees do not oppose the one-day extension of time sought in this Motion.

4. Pursuant to Rule 21(b), Tennessee Rules of Appellate Procedure, “good cause” exists to enlarge by one day the time prescribed by Rule 29(a) for the filing of the Reply Brief.

WHEREFORE, the Election Commission respectfully requests that the Court enlarge by one day the time prescribed by Rule 29(a) for the filing of the Reply Brief.

DATED: November 18, 2021

Respectfully submitted,

/s/ James F. Blumstein

James F. Blumstein (No. 004147)
2113 Hampton Avenue
Nashville, Tennessee 37215
Phone: (615) 385-2875
Fax: (615) 385-3342
James.Blumstein@Vanderbilt.edu

- and -

/s/ Austin L. McMullen

Austin L. McMullen (No. 020877)
BRADLEY ARANT BOULT CUMMINGS, LLP
1600 Division Street, Suite 700
P. O. Box 340025
Nashville, Tennessee 37203
Phone: (615) 252-2307
Fax: (615) 252-6307
AMcMullen@Bradley.com

*Attorneys for Respondent/Defendant Davidson
County Election Commission*

CERTIFICATE OF SERVICE

I hereby certify that on this the 18th day of November, 2021, I have caused a true and correct copy of the foregoing to be sent electronically, by email, and by U.S. Mail, postage pre-paid, to the following:

Wallace W. Dietz
Lora Barkenbus Fox
Allison Bussell
Melissa Roberge
Metropolitan Courthouse, Suite 108
P.O. Box 196300
Nashville, Tennessee 37219
lora.fox@nashville.gov
allison.bussell@nashville.gov
melissa.roberge@nashville.gov

Robert E. Cooper, Jr.
3907 Kimpalong Drive
Nashville, TN 37205

/s/ Austin L. McMullen

Austin L. McMullen