

**IN THE UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

THE SATANIC TEMPLE, INC.,

PLAINTIFF / APPELLANT,

v.

CITY OF BELLE PLAINE, MN,

DEFENDANT / APPELLEE.

CASE NO. 21-3079 and 21-3081

**MOTION TO EXTEND DEADLINE
FOR OPENING BRIEFS,
ADDENDA, AND APPENDICES**

COMES NOW The Satanic Temple, Inc. (“TST”) on motion to extend its opening briefs deadline to **February 4, 2022**, pursuant to Eighth Circuit Rule 27A.

1. TST’s opening briefs, addenda, and appendices are currently due on January 5, 2022.
2. Counsel requests an extension of 30 days, to February 4.
3. To date, two 30-day extensions have been received.
4. Good cause exists to extend Appellant’s deadline to file the opening briefs, addenda, and appendices. Counsel’s ability to work on the briefs in these cases has been hampered by an illness that, Counsel learned today, is COVID-19. Additionally, Counsel’s wife

serves in a paralegal capacity on this case, and she has developed symptoms of a viral infection. Last, Counsel's schedule includes several other appeals as well as multiple trial court matters.

5. Additional time would permit Appellant to fully and adequately brief the issues involved in the case. In turn, this will assist the Court in its determination of the issues.

6. This request is made in good faith and the foregoing constitutes "good cause."

Respectfully submitted
on December 22, 2021,
on behalf of Plaintiff / Appellant

By: Matthew A. Kezhaya, ABA # 2014161



KEZHAYA LAW PLC
1202 NE McClain Rd
Bentonville, AR 72712

phone: (479) 431-6112
email: matt@kezhaya.law

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Matthew A. Kezhaya

CERTIFICATE OF COMPLIANCE

This motion to extend time for filing complies with the type-volume limitations of FRAP 27(d)(2)(A) because this motion contains 175 words, excluding the parts of the motion exempted by FRAP 27(a)(2)(B). This motion complies with the typeface requirements of FRAP 32(a)(5) and the type style requirements of FRAP 32(a)(6) because this motion has been prepared in a proportionally spaced typeface in Calisto MT, 14pt font. This motion has been scanned for viruses and is virus-free.

/s/ Matthew A. Kezhaya