IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS, WESTERN DIVISION

CANNA PROVISIONS, INC., GYASI SELLERS, WISEACRE FARM, INC., VERANO HOLDINGS CORP. No. 23-cv-30113

PLAINTIFFS,

-against-

MERRICK GARLAND, IN HIS CAPACITY AS ATTORNEY GENERAL OF THE UNITED STATES,

DEFENDANT.

JOINT MOTION TO EXTEND THE TIME TO RESPOND TO PLAINTIFFS' COMPLAINT

Plaintiffs Canna Provisions, Inc., Gyasi Sellers, Wiseacre Farm, Inc., and Verano Holdings Corp. ("Plaintiffs") and Defendant Merrick Garland, in his official capacity as Attorney General of the United States ("Defendant"), through their undersigned counsel, respectfully move jointly to adjust the case deadlines as follows:

- Defendant's deadline to respond to Plaintiff's Complaint is extended 28 days from December 26, 2023, to January 23, 2024.
- If Defendant files a motion to dismiss, Plaintiffs may have until March 15, 2024 to file opposition papers.

The parties respectfully submit that these adjustments are warranted in light of the obligations of counsel in other litigation matters and the holiday season. The parties agree that these requested extensions are reasonable, will not prejudice any party, and will not unduly delay resolution of this matter.

Date: December 15, 2023

/s/ Joshua Schiller

Boies Schiller Flexner LLP David Boies (admitted pro hac vice) 333 Main Street Armonk, NY 10504 (914) 749-8200 dboies@bsfllp.com

Jonathan D. Schiller (admitted pro hac vice) Matthew L. Schwartz (admitted pro hac vice) David Barillari (admitted pro hac vice) 55 Hudson Yards New York, NY 10001 (212) 446-2300 jschiller@bsfllp.com mlschwartz@bsfllp.com dbarillari@bsfllp.com

Joshua I. Schiller (admitted pro hac vice) 44 Montgomery Street 41st Floor San Francisco, CA 94104 (415) 293-6899 jischiller@bsfllp.com

Lesser, Newman, Aleo & Nasser LLP

Michael Aleo Thomas Lesser 39 Main Street, Suite 1 Northampton, MA 01060 Telephone: (413) 584-7331 Facsimile: (413) 586-7076 aleo@LNN-law.com lesser@LNN-law.com

Attorneys for the Plaintiffs Canna Provisions, Inc., Gyasi Sellers, Wiseacre Farm, Inc., and Verano Holdings Corp. Respectfully submitted,

/s/ Jeremy Newman (with consent)

Jeremy S.B. Newman United States Department of Justice Civil Division, Federal Programs Branch 1100 L Street, N.W. Washington, DC 20005 Tel: (202) 532-3114 Email: jeremy.s.newman@usdoj.gov

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2023, I caused a copy of the foregoing Joint Motion to be served, via the electronic case filing system of the Court, on all counsel of record for the parties in these proceedings.

Dated: December 15, 2023

<u>/s/ David Barillari</u> David Barillari