

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BONITA SHREVE, <i>et al.</i>)
)
<i>Plaintiffs,</i>)
)
v.)
)
UNITED STATES POSTAL SERVICE, <i>et al.</i>)
)
<i>Defendants.</i>)
)

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION

Pursuant to Fed. R. Civ. P. 6(b), Plaintiffs Bonita Shreve, Gun Owners of America, Inc., and Gun Owners Foundation, by and through undersigned counsel, move for a thirty (30) day extension to file their Combined Reply in Support of Their Motion for Summary Judgment and Opposition to Defendants' Cross-Motion for Summary Judgment.

Currently, Plaintiffs' filing is due on February 5, 2026. Extending this deadline by 30 days would allow Plaintiffs' filing to be due on March 9, 2026. Likewise, Defendants' Reply in Support of Their Motion is currently due on March 2, 2026. Defendants explained that they did not oppose Plaintiffs' requested relief "assuming all deadlines, including Defendants' final reply deadline, is also extended by 30 days."¹ With that, Defendants new Reply deadline would be extended to April 8, 2026.

Defendants' Combined Opposition to Plaintiffs' Motion for Summary Judgment and Cross-Motion for Summary Judgment, filed on January 16, 2026, made several arguments relating to a newly issued Office of Legal Counsel opinion on the constitutionality of 18 U.S.C. § 1715 (*see*

¹ Pursuant to Section D of this Court's Interim Standing Order, Plaintiffs have conferred with Defendants on January 26, 2026 via email, regarding their position on Plaintiffs' requested relief. Defendants provided the quoted statement.

ECF No. 27-1), the statute challenged here. Because Defendants raise new arguments distinct from addressing the merits of Plaintiffs' Motion for Summary Judgment, Plaintiffs request the above-described extension to allow additional time to review.

Moreover, two of Plaintiffs' counsel were out of town from January 19, 2026 to January 23, 2026 at an annual convention. Additionally, one of Plaintiffs' counsel will be attending oral argument in the U.S. Court of Appeals for the District of Columbia on January 29, 2026, in *Gun Owners of America, Inc., et al., v. Bureau of Alcohol, Tobacco, Firearms and Explosives*, No. 25-5309.

For these reasons, Plaintiffs respectfully request that this Court grant this Motion for Extension and allow (1) an additional thirty (30) days, or until March 9, 2026, for Plaintiffs to file their Combined Reply in Support of Their Motion for Summary Judgment and Opposition to Defendants' Cross-Motion for Summary Judgment; (2) extend Defendants' deadline until April 8, 2026, for Defendants to file their Reply in Support of Their Motion; and (3) extend any other current deadlines by thirty (30) days.

Dated: January 26, 2026

Gilbert J. Ambler (PA 326124)
 Oliver M. Krawczyk (PA 334423)
 AMBLER LAW OFFICES, LLC
 115 South Hanover Street, Suite 100
 Carlisle, PA 17013
 T: (717) 525-5822
 F: (540) 773-2414
 gilbert@amblerlawoffices.com
 oliver@amblerlawoffices.com

Respectfully submitted,

/s/ Stephen D. Stamboulieh
 Stephen D. Stamboulieh (MS 102784)
 STAMBOULIEH LAW, PLLC
 P.O. Box 428
 Olive Branch, MS 38654
 T: (601) 852-3440
 stephen@sdlaw.us

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on January 26, 2026, Plaintiffs served the foregoing Motion on all parties in this matter via the Court's electronic filing system.

Dated: January 26, 2026

/s/ Stephen D. Stamboulieh
Stephen D. Stamboulieh