IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

TYLER M. PAETKAU, on behalf of himself and all others similarly situated, **Plaintiff,** **v.** **HUSCH BLACKWELL LLP; THE EXECUTIVE BOARD OF HUSCH BLACKWELL LLP, AND ITS MEMBERS Joe Glynias, Jamie Lawless, Jen Dlugosz, Julie Miceli, Joe Geraci, Hayley Hanson, Phil Koutnik, Ann Maher, Nikelle Meade, Sonni Nolan, Tom Shorter, Rudy Telscher, Ed Wilson, Jai Khanna, and J.Y. Miller; and Does 1-30** **Defendants.**	**Case No. 4:25-cv-00721-FJG**

JOINT MOTION FOR SECOND EXTENSION OF TIME FOR DEFENDANTS TO FILE THEIR MOTION FOR ATTORNEY'S FEES AND COSTS AND FOR PLAINTIFF TO FILE A NOTICE OF APPEAL

Plaintiff Tyler M. Paetkau ("Plaintiff") and Defendants Husch Blackwell LLP, the Executive Board of Husch Blackwell LLP, and its members Joe Glynias, Jamie Lawless, Jen Dlugosz, Julie Miceli, Joe Geraci, Hayley Hanson, Phil Koutnik, Ann Maher, Nikelle Meade, Sonni Nolan, Tom Shorter, Rudy Telscher, Ed Wilson, Jai Khanna, and J.Y. Miller ("Defendants"), by and through undersigned counsel, jointly request a second extension of time for Defendants to file their Motion for Attorney's Fees and Costs, and for Plaintiff to file a notice of appeal. In support of this motion, the Parties state as follows:

1. On September 30, 2026, the Parties requested an extension to the deadlines for Defendants to move for attorney's fees and costs, and for Plaintiff to file a notice of appeal, to

enable the Parties to continue discussions regarding a potential agreement which would render moot any appeal or motion for attorney's fees. ECF No. 51.

2. Specifically, the Parties requested an extension to November 16, 2026, for both deadlines. *Id.*

3. On October 1, 2026, the Court granted the extension, setting both deadlines for November 16, 2026. ECF No. 52.

4. The Parties have now reached an agreement, which will become final and enforceable on November 24, 2026, if not revoked.

5. Accordingly, the Parties seek an additional 10-day extension, up to and including November 27, 2026, to Defendants' deadline to file a motion for attorney's fees and Plaintiff's deadline to file a notice of appeal, in order for the agreement to become enforceable prior to the expiration of those deadlines.

6. Good cause exists to grant this Motion. Granting the Motion would allow the parties to finalize their agreement which would render moot any appeal or motion for attorney's fees and conserve judicial and party resources that would be consumed by litigating a motion for attorney's fees and an appeal. This Motion is not made for purposes of undue delay or for any other improper purpose and will not adversely affect any party to this matter.

7. Defendants expressly waive and forfeit any objections, defenses, or arguments based on the timeliness of Plaintiff's notice of appeal, provided that Plaintiff files a notice of appeal by November 27, 2026.

WHEREFORE, the Parties respectfully request that the Court enter an Order extending Defendants' deadline to file a motion for attorney's fees and costs and Plaintiff's deadline to file

a notice of appeal to November 27, 2026, and for such other relief as the Court deems just and proper.

Respectfully submitted this 16th day of November 2026.

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