

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

O. John Benisek, et al.,
Plaintiffs,

vs.

Linda H. Lamone, et al.,
Defendants.

Case No. 13-cv-3233

Three-Judge Court

**JOINT MOTION TO EXTEND DEADLINES FOR COMPLETION OF FACT
DISCOVERY AND EXPERT WITNESS DISCOVERY**

Pursuant to the Court's March 28, 2017 order (Dkt. No. 171) and Federal Rule of Civil Procedure 16, Plaintiffs and Defendants respectfully move for an order extending the deadline to complete expert witness discovery, to accommodate the deposition of one of Plaintiffs' experts, Professor Michael McDonald. Professor McDonald's deposition was originally scheduled to take place prior to the June 2, 2017 deadline for the completion of expert discovery, but was moved to June 5, 2017 due to an illness. Therefore, the parties agree that there is good cause to extend the deadline for the completion of expert discovery from Friday, June 2, 2017 to Monday, June 5, 2017. All other dates on the Parties' previously agreed schedule remain the same. *See* Dkt. Nos. 170, 171.

Wherefore, the parties respectfully request that the Court enter an order adopting the agreed modified deadline for the completion of expert discovery from June 2, 2017 to June 5, 2017.

Dated: May 31, 2017

/s/ Jennifer L. Katz

(signed by Michael B. Kimberly with permission of Jennifer L. Katz)

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2017, a copy of the foregoing joint motion was filed and served via the Court's CM/ECF system and separately served via electronic mail upon all counsel of record pursuant to the consent of all parties.

/s/ Stephen M. Medlock

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