

**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 DISCLOSURES**

Pursuant to the Court’s March 13, 2017 order (Dkt. 166) and Federal Rule of Civil Procedure 16, Plaintiffs and Defendants respectfully move for an order extending certain discovery deadlines. The parties agree that there is good cause to extend certain discovery and expert witness deadlines, as outlined below. Since the Court’s March 13, 2017 order concerning legislative privilege, the parties have met and conferred regarding a schedule to complete the depositions and document productions called for by the order. The parties agree that the following schedule:

| <b>Event</b>                          | <b>Prior Deadline</b>  | <b>New Deadline</b> |
|---------------------------------------|--|---------------------|
| Completion of depositions             | 14 days following the full Court’s order on the out-standing discovery motions | May 1, 2017         |
| Plaintiffs’ Rule 26(a)(2) disclosures | 14 days following the full Court’s order on the out-standing discovery motions | April 7, 2017       |
| Defendant’s Rule 26(a)(2) disclosures | 28 days following Plaintiffs’ Rule 26(a)(2) disclosures                        | May 5, 2017         |

| <b>Event</b>   | <b>Prior Deadline</b>   | <b>New Deadline</b> |
|--|---|---------------------|
| Plaintiff's rebuttal Rule 26(a)(2) disclosures             | 7 days following Defendant's Rule 26(a)(2) disclosures          | May 19, 2017        |
| Rule 26(e)(2) supplementation of disclosures and responses | 7 days following Plaintiff's rebuttal Rule 26(a)(2) disclosures | June 2, 2017        |
| Expert discovery deadline; submission of status report     | 7 days following Plaintiff's rebuttal Rule 26(a)(2) disclosures | June 2, 2017        |

The Parties are continuing to meet and confer regarding the form and schedule for dispositive motions briefing and trial. Notwithstanding their agreement to these or any other deadlines, Plaintiffs reserve their right to move for preliminary or permanent injunctive relief at an appropriate time.

Wherefore, the parties respectfully request that the Court enter an order adopting the agreed modified schedule.

Dated: March 27, 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 27th day of March, 2017, a copy of the foregoing 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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