

**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 CERTAIN EXPERT
WITNESS DISCLOSURES**

Pursuant to 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 expert witness deadlines by one business day, as outlined below. The parties agree that the following schedule should be entered:

Event	Prior Deadline	New Deadline
Defendant's Rule 26(a)(2) disclosures	May 5, 2017	May 8, 2017
Plaintiff's rebuttal Rule 26(a)(2) disclosures	May 19, 2017	May 22, 2017
Rule 26(e)(2) supplementation of disclosures and responses	June 2, 2017	June 2, 2017
Expert discovery deadline; submission of status report	June 2, 2017	June 2, 2017

The Parties continue 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: May 2, 2017

/s/ Jennifer L. Katz

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Respectfully submitted,

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