

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ASHTON WHITAKER, a minor, by his
mother and next friend, MELISSA
WHITAKER,

Plaintiff,

v.

KENOSHA UNIFIED SCHOOL DISTRICT
NO. 1 BOARD OF EDUCATION, *et al.*,

Defendants.

Civ. Action No. 2:16-cv-00943-PP
Judge Pamela Pepper

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Ashton Whitaker and Defendants Kenosha Unified School District No. 1 Board of Education and Sue Savaglio-Jarvis (“Defendants”) (collectively, the “Parties”), jointly move the Court to modify the scheduling order entered by this Court on October 21, 2016 [Dkt. No. 53], as previously modified by text order entered on December 13, 2016. To avoid unnecessary conflicts with the Parties’ briefing schedule and proceedings in Defendants’ appeal of the preliminary injunction entered in this case, and in the interest of minimizing discovery burdens on Plaintiff during the final months of his senior year of high school, the Parties have agreed to a schedule that would extend fact and expert discovery through June 2017.

The Parties propose the following modified schedule:

- Deadline for Parties to exchange written discovery responses: January 27, 2017
- Deadline for Plaintiff’s expert witness disclosures: February 21, 2017
- Deadline for Defendants’ expert witness disclosures: April 20, 2017
- Deadline for Plaintiff to file motion seeking leave to identify rebuttal experts: May 10, 2017
- Fact discovery cut-off: June 16, 2017
- Expert discovery cut-off: June 30, 2017
- Deadline for dispositive motions: July 31, 2017

If the Court grants this motion, the Parties request a status conference to reset the trial date and other pretrial deadlines.

Based on the foregoing, the Parties respectfully request that the Court enter the proposed modified scheduling order, which will be submitted via email to the Court's proposed orders email box.

Dated: January 9, 2017

Respectfully submitted,

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