

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

DREW ADAMS, a minor, by and through  
his next friend and mother, ERICA  
ADAMS KASPER,

Plaintiff,

v.

THE SCHOOL BOARD OF ST. JOHNS  
COUNTY, FLORIDA,

Defendant.

Case No. 3:17-cv-00739-TJC-JBT

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**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE DAUBERT MOTIONS TO DECEMBER 6, 2017**

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Plaintiff, Drew Adams, a minor, by and through his next friend and mother, Erica Adams Kasper (“Plaintiff”) and Defendant, The School Board of St. Johns County, Florida (the “School Board”) (collectively, the “parties”), by and through their undersigned counsel, hereby jointly move this Court for an order permitting the parties to file their respective *Daubert* motions by no later than December 6, 2017, which is one week beyond the current deadline for motions set by the Court.

In its Case Management and Scheduling Order, the Court ordered that any *Daubert* motions be filed by November 29, 2017. Dkt. 59 at 2, n.2. However, the Court further noted, “[b]ecause this is a non-jury trial and the case is being scheduled on an expedited basis, the Court does not intend to decide any Daubert motions in advance of trial.” *Id.* On November 16, 2017, the Court granted an extension of time to file the *Daubert* motion pertaining to one

of Defendant's proposed expert witnesses, Dr. Allan Josephson, to December 6, 2017. Dkt. 96.

District courts retain broad discretion in managing their cases, including discovery and scheduling. *Chrysler Int'l Corp. v. Chemaly*, 280 F.3d 1358, 1360 (11th Cir. 2002). The parties have conferred and hereby respectfully request that the Court grant leave for the parties to file their respective *Daubert* motions by December 6, 2017, which is approximately a week before trial is scheduled in this matter and the same date already set for the *Daubert* motion as to Dr. Josephson. Due to some pending discovery and the need to adequately review said discovery as well as deposition transcripts, the parties agree that this request is necessary. In light of the fact that the Court does not intend to decide any *Daubert* motions in advance of trial and the fact that there are a significant number of issues the parties need to by November 29, 2017, the parties believe the requested relief is appropriate and would not prejudice any party.

For the foregoing reasons and for good cause showing, the parties hereby respectfully request an Order from the Court as follows: The parties may file a *Daubert* motions as to any expert witness in advance of trial, but no later than December 6, 2017.

Dated: November 27, 2017.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2017, the foregoing motion was filed electronically using the Court's ECF system, which will provide electronic notice to all counsel of record, including:

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