

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

JAMEKA K. EVANS	)	
	)	Civil Action No:
Plaintiff,	)	4:15-CV-00103-JRH-GRS
	)	
v.	)	
	)	
GEORGIA REGIONAL	)	
HOSPITAL AT SAVANNAH, and	)	
LISA CLARK in her official	)	
capacity, and CHARLES MOSS	)	
in his individual capacity,	)	
	)	
Defendants.	)	
	)	
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**CONSENT MOTION TO EXTEND THE DEADLINE TO ANSWER  
OR OTHERWISE RESPOND TO THE AMENDED COMPLAINT**

COMES NOW, Georgia Regional Hospital at Savannah, Defendant in the above-styled action, by and through counsel, the Attorney General of the State of Georgia, and submits this Consent Motion to Extend the Deadline to Answer or Otherwise Respond to the Amended Complaint. In support of this Motion, Defendant shows this Court as follows:<sup>1</sup>

Pursuant to the Court’s Order of August 4, 2017, Plaintiff Jameka Evans filed an Amended Complaint on September 11, 2017. (*See* Dkt. Nos. 27, 28.)

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<sup>1</sup> In filing this motion, GRH-S expressly reserves the right to assert any and all defenses available to it at the time of filing its Answer or other responsive pleading, including, but not limited to, lack of jurisdiction and insufficient service.

Evans subsequently served Defendant Georgia Regional Hospital at Savannah (“GRH-S”) on December 1, 2017. Therefore, the current deadline for GRH-S to file an Answer or other Response to the Amended Complaint is December 22, 2017. Fed. R. Civ. P. 12(a)(1)(A). In addition to GRH-S, Plaintiff has named Charles Moss and Lisa Clark as Defendants in this action. Moss and Clark have both waived service; their answer or response to the Amended Complaint is due on January 29, 2018. Fed. R. Civ. P. 4(d)(3); Dkt. Nos. 35, 36.

The undersigned represents all of the named Defendants in this action. In order to streamline the discovery process and corresponding deadlines, Defendant GRH-S respectfully requests that the deadline for its answer or other responsive pleading be extended by thirty nine (39) days, such that all named Defendants shall be required to respond to the Amended Complaint by January 29, 2018, and may thereafter proceed on the same discovery schedule.

Defendant has conferred with counsel for Plaintiff and is authorized to represent that Plaintiff consents to the present motion.

Respectfully submitted, this 13th day of December, 2017.

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2017, I electronically filed the foregoing **CONSENT MOTION TO EXTEND THE DEADLINE TO ANSWER OR OTHERWISE RESPOND TO THE AMENDED COMPLAINT** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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