

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

KIMBERLY A. HIVELY

Plaintiff,

v.

IVY TECH COMMUNITY COLLEGE,

Defendant.

CAUSE NO. 3:14-CV-1791-JD-MGG

JOINT MOTION FOR AN EXTENSION OF CURRENT DEADLINES

Plaintiff Kimberly Hively and Defendant Ivy Tech Community College move for a 60-day extension of the current deadlines.

A number of discovery disputes have arisen in this case. The parties have met and conferred and hope that these disputes are now largely resolved. Because of the disputes, and the negotiations to avoid motion practice, the written discovery and the depositions needed to prepare and serve expert reports have not been completed. At this time, the parties have agreed to a deadline for supplemental production by Defendant for December 22, 2017 and have re-scheduled depositions for the fourth week of January. Those dates however make it impossible for the parties to meet the current deadlines to serve expert reports. Accordingly, the parties move to extend the current deadlines by sixty (60) days for orderly completion of discovery and expert reports.

The present deadlines are as follows:

Present Deadlines	
Event	Date
Plaintiff shall file and serve any expert reports, under Fed. R. Civ. P. 26(a)(2)	December 22, 2017 (Dkt. No. 47)
Defendant shall file and serve any expert reports, under Rule 26(a)(2)	January 22, 2018 (Dkt. No. 47)
Close of discovery	March 9, 2018 (Dkt. No. 44)

Parties will conduct mediation no later than:	April 9, 2018 (Dkt. No. 44)
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A 60-day extension would move the deadlines to the following dates:

Proposed Deadlines	
Event	Date
Plaintiff shall file and serve any expert reports, under Fed. R. Civ. P. 26(a)(2)	February 22, 2018
Defendant shall file and serve any expert reports, under Rule 26(a)(2)	March 22, 2018
Close of discovery	May 9, 2018
Parties will conduct mediation no later than:	June 9, 2018

Good cause exists for granting this order because the request is not due to needless delay; rather the request results from the parties resolving discovery disputes while avoiding motion practice before the Court. Accordingly, the parties request a 60-day extension of the deadlines in this case to the dates set forth above. Additionally, a proposed order showing these changes is attached as Exhibit A.

Date: December 20, 2017

Respectfully submitted,

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EXHIBIT A

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[PROPOSED] ORDER

On December 20, 2017, the parties filed a Joint Motion For An Extension of Current Deadlines.

With good cause shown the Court now **GRANTS** the joint motion. The deadlines for the parties are **EXTENDED** as follows: (1) Plaintiff shall file and serve any expert reports, under Fed. R. Civ. P. 26(a)(2), by **February 22, 2018**; (2) Defendant shall file and serve any expert reports, under Rule 26(a)(2), by **March 22, 2018**; (3) close of discovery is **May 9, 2018**; and (4) Parties will conduct mediation no later than **June 9, 2018**.

SO ORDERED.

Dated this _____ day of December 2017.

United States Magistrate Judge