

**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,

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

v.

**THE SCHOOL BOARD OF ST. JOHNS
COUNTY, FLORIDA,**

Defendant.

**DEFENDANT'S CONSENTED MOTION FOR EXTENSION OF TIME TO
FILE PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Defendant, by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 6(b) and M. D. Loc. R. 3.01(a) and (g), respectfully moves this Court for a two-day extension of time for the parties to file their proposed Findings of Fact and Conclusions of Law. In support hereof, Defendant states as follows:

1. On December 21, 2017, the Court entered an Order requiring the parties to file their proposed Findings of Fact and Conclusions of Law by no later than January 24, 2018. [Doc. 154]. The parties have also been ordered to prepare other supplemental briefs by February 5, 2018. [Doc. 159].

2. As the Court is aware, the three-day trial transcript, deposition transcripts of Drs. Adkins and Ehrensaft, and documentary evidence are voluminous. The legal issues in this case are likewise dynamic and unique.

3. Defendant has worked diligently and in good faith to meet the January 24, 2018, deadline. However, due to the voluminous record and legal issues to be addressed, Defendant represents to the Court that it needs more time to complete and files its proposed Findings of Fact and Conclusions of Law.

4. Defendant respectfully requests a two-day extension of the deadline for the parties to submit their proposed Findings of Fact and Conclusions of Law (from January 24, 2018, to January 26, 2018). This request is not intended to delay the proceedings or otherwise alter any other deadlines, including the oral argument scheduled for February 16, 2018.

CERTIFICATE OF COUNSEL CONFERENCE

Pursuant to M.D. Fla. Loc. R. 3.01(g), the undersigned certifies that on January 19, 2018, he conferred with Plaintiff's counsel with respect to the relief requested herein. Plaintiff's counsel advised that Plaintiff does not oppose the relief sought so long as Plaintiff's deadline is also extended to January 26, 2018.

MEMORANDUM OF LAW IN SUPPORT

Defendant's request falls within the scope of Fed. R. Civ. P. 6(b) which provides the Court with wide discretion to enlarge the time for doing an act which

may or must be done within a specified time. As reflected hereinabove, Defendant is seeking a two-day extension of time for the parties to submit their proposed Findings of Fact and Conclusions of Law due to the voluminous trial record and legal issues involved in this case. Defendant's request is in no way intended to delay the proceedings. Based on the foregoing, Defendant submits that sufficient grounds exist to grant the brief extension of time requested.

WHEREFORE, Defendant respectfully requests the entry of an Order extending the deadline for the parties to file their proposed Findings of Fact and Conclusions of Law up to and including January 26, 2018, along with any other relief the Court deems appropriate.

Respectfully submitted,

/s/ Terry J. Harmon

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 19th day of January, 2018, a true and correct copy of the foregoing was electronically filed in the U.S. District Court, Middle District of Florida, using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Terry J. Harmon

TERRY J. HARMON