

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

KIMBERLY A. HIVELY,)
)
 Plaintiff,)
)
 vs.) 3:14-CV-01791-JD-MGG
)
 IVY TECH COMMUNITY COLLEGE,)
)
 Defendant.)

JOINT MOTION TO EXTEND DEADLINES

In order to accommodate certain issues related to expert witnesses, the parties jointly move the Court to adjust the upcoming deadlines in this matter as described below.

1. Plaintiff was to file and serve her expert report(s) by February 22, 2018. [DE 50]. Defendant was then to file and serve its expert report(s) by March 22, 2018. [*Id.*].

2. Plaintiff served an expert report related to economic damages on or before February 22, 2018, but sought an extension to the deadline for purposes of submitting a report from a healthcare provider. [DE 55].

3. The extension was granted by the Court and Plaintiff's deadline to submit a report from her healthcare provider is currently March 26, 2017. [DE 56]. Defendant's expert report deadline remained unchanged. [*Id.*].

4. Discovery is scheduled to close on May 9, 2018, and mediation must currently be completed by June 9, 2018. [DE 50].

5. Due to difficulties in securing and communicating with the various experts, additional time is now needed by both parties.

6. To address these difficulties, the parties propose the following revised schedule:

- J April 9, 2018 - Deadline for Plaintiff to file and serve a report from a healthcare provider;
- J April 23, 2018 – Deadline for Defendant to file and serve a report from an economic damages expert;
- J May 9, 2018 – Deadline for Defendant to file and serve a report from a health care provider;
- J June 11, 2018 – Close of discovery; and
- J July 11, 2018 – Deadline to conduct mediation.

7. The requested revisions to the schedule in this matter are not being sought for purposes of delay and instead are sought to avoid prejudice to any party.

WHEREFORE, the parties respectfully request that the existing deadlines be extended as set forth herein and for all other relief just and proper in the circumstances.

s/ Daniel H. Pfeifer (w/ permission)

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