

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
ATHENS DIVISION

SKYLAR MUSGROVE,

Plaintiff,

v.

THE BOARD OF REGENTS OF THE  
UNIVERSITY SYSTEM OF GEORGIA,  
JAMES HULL,  
JERE MOREHEAD, KARIN ELLIOTT,  
BLUE CROSS BLUE SHIELD  
HEALTHCARE PLAN OF GEORGIA,  
INC., AND METROPOLITAN LIFE  
INSURANCE COMPANY,

Defendants.

Civil Action No.

3:18-cv-00080-CDL

JURY TRIAL DEMANDED

**PLAINTIFF’S CONSENT MOTION TO EXTEND DEADLINE TO  
RESPOND IN OPPOSITION TO DEFENDANT BLUE CROSS BLUE  
SHIELD HEALTHCARE PLAN OF GEORGIA, INC.’S  
MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Now comes Plaintiff Skyler Musgrove (“Plaintiff” or “Mr. Musgrove”), pursuant to Federal Rule of Civil Procedure 6 and LR 6.1, and with Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.’s (“BCBSHP”) consent, files this motion for an extension of time to respond to Defendant BCBSHP’s

Motion to Dismiss Plaintiff's Complaint. In support of this Motion Plaintiff shows as follows:

1. This action was filed on June 28, 2019. [Doc. No. 1.]
2. On July 27, 2018, the parties stipulated to extend BCBSHP's time to respond to the complaint until August 24, 2018. [Doc. No. 18.]
3. On August 24, 2018, BCBSHP filed a Motion to Dismiss Plaintiff's Complaint. [Doc. No. 24.]
4. Mr. Musgrove's response is currently due on September 7, 2018.
5. In order to cogently address the variety of issues BCBSHP raised in its Motion to Dismiss, Mr. Musgrove requests a two-week extension of time to file his response, up through and including September 21, 2018.
6. Counsel for BCBSHP has been consulted and consents to this requested extension.
7. This Court has wide discretion to grant extensions of time. See e.g., American Key Corp. v. Cole Nat'l Corp., 762 F.2d 1569, 1576 (11<sup>th</sup> Cir. 1985). Moreover, extensions are routinely granted where good cause for the requested extension has been sufficiently demonstrated.
8. This extension is not requested for purposes of delay.

9. A proposed Consent Order effectuating this requested extension is attached hereto for the Court's convenience.

Respectfully submitted this 7th day of September, 2018.

**BARRETT & FARAHANY**

s/ Amanda A. Farahany  
Amanda A. Farahany  
Georgia Bar No. 646135

*Attorney for Skylar Musgrove*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed using the CM/ECF system, which will send electronic notification to all attorneys of record.

Respectfully submitted this 7th day of September, 2018.

**BARRETT & FARAHANY**

*s/ Amanda A. Farahany*

Amanda A. Farahany

Georgia Bar No. 64613

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**CONSENT ORDER**

This matter is before the Court on Plaintiff’s Consent Motion to Extend Deadline to Respond to Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.’s Motion to Dismiss (the “Motion”). Having considered all matters of record, and for good cause shown, the Motion is hereby **GRANTED**. Accordingly, Plaintiff’s deadline to respond to Defendant BCBSHP’s Motion to Dismiss is hereby **EXTENDED** up through and including September 21, 2018.

**SO ORDERED**, this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

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HONORABLE CLAY D. LAND  
UNITED STATES DISTRICT JUDGE