

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

PATRICK M. SHANAHAN, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

NICHOLAS HARRISON, ET AL.,

PLAINTIFFS,

V.

PATRICK M. SHANAHAN, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-CV-00641

**PARTIES' JOINT MOTION TO MODIFY THE  
SCHEDULING ORDER FOR THE LIMITED PURPOSE OF  
TAKING SEVERAL DEPOSITIONS OUT OF TIME**

The Parties respectfully request that this Court amend the Modified Scheduling Order entered in these cases to permit the depositions of three witnesses after the close of fact discovery. The Parties submit that there is good cause to take these depositions beyond the deadline previously agreed-upon by the parties in the consolidated discovery schedule as set forth in the Memorandum submitted in support of this Motion. Therefore, the Parties respectfully request that their motion be granted and that they be permitted to take the depositions of three fact witnesses after the scheduled close of fact discovery.

Dated: March 15, 2019

/s/ Scott Schoettes

Respectfully submitted,

/s/ Andrew R. Sommer

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## CERTIFICATE OF SERVICE

I certify that, on the 15th day of March, 2019, I caused this document to be filed electronically through the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: March 15, 2019

Respectfully submitted,

*/s/ Andrew R. Sommer*

Andrew R. Sommer