

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

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

MARK T. ESPER, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

**PLAINTIFFS' MOTION TO MODIFY THE COURT'S SCHEDULING
ORDER FOR THE LIMITED PURPOSE OF TAKING A DEPOSITION OUT OF TIME**

Plaintiffs respectfully request that this Court enter an order permitting the deposition of Col. Patrick Danaher to be taken out of time, beyond the deadline for fact discovery of March 15, 2019, set by this Court *Harrison, et al. v. Shanahan, et al.*, see ECF No. 106, and in *Roe, et al. v. Shanahan, et al.*, see ECF No. 32. Plaintiffs submit that there is good cause to take this deposition beyond the deadline previously set by this Court, as further explained in the memorandum accompanying this motion.

Dated: July 3, 2019

/s/ Scott Schoettes

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CERTIFICATE OF SERVICE

I certify that, on the 3rd day of July, 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: July 3, 2019

Respectfully submitted,

/s/ John W. H. Harding

John W.H. Harding