

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

ROBERT L. VAZZO, LMFT, etc., et al.,)	
)	
Plaintiffs,)	
)	Case No. 8:17-cv-2896-T-02AAS
v.)	
)	
CITY OF TAMPA, FLORIDA,)	
)	
Defendant.)	
)	

**PLAINTIFFS’ UNOPPOSED MOTION
TO AMEND DISPOSITIVE MOTIONS BRIEFING DEADLINES
AND REQUEST FOR EXPEDITED CONSIDERATION**

Plaintiffs, for good cause shown below, respectfully move the Court for an order amending the Court’s case management and scheduling deadlines for dispositive motion briefing, for all parties, to accommodate Plaintiffs’ counsel’s accumulated professional obligations, and two personal obligations of the undersigned Plaintiffs’ counsel, as follows:

Event	Current Date	Proposed Date
Dispositive, <i>Daubert</i> , and <i>Markman</i> Motions Deadline	August 19, 2019	August 23, 2019 (4-day extension)
Responses in Opposition	September 9, 2019	September 11, 2019 (2-day adjustment)
Replies	September 23, 2019	September 23, 2019 (unchanged)
Dispositive Motion Hearing	September 24, 2019	September 24, 2019 (unchanged)

GOOD CAUSE FOR EXTENSION

Plaintiffs show the Court good cause exists for the extensions requested in this motion, as follows:

1. Since the Court's Order of June 14, 2019 (Doc. 181), the parties worked diligently and cooperatively to complete discovery on time, completing the depositions of the parties' respective experts between July 25 and August 1. The parties received the first of those transcripts last week, on August 9, and two of the transcripts yesterday, August 13. The fourth and final transcript is expected any day.

2. Despite Plaintiffs' counsel's diligence, they have been subject to stacked proceedings and deadlines in three other federal cases requiring two travel days to attend a preliminary injunction hearing in Maryland early last week, dispositive motion briefing this week, appellate briefing next week, and preparation for a dispositive motions hearing in Massachusetts early the following week. Furthermore, the undersigned counsel for Plaintiffs will attend the funeral of a family member in Jacksonville this week, and is moving his son to college in Jacksonville next week, with corresponding preparations occurring this week and next.

3. The accumulation of the foregoing obligations, as well as the very recent and still pending acquisition of expert deposition transcripts, have interfered with Plaintiffs' counsel's ability to devote the necessary time to dispositive motion briefing in this case.

4. Prior to filing this motion, the undersigned counsel conferred with counsel for Defendants, and is authorized to represent to the Court that Defendants do not oppose the mutual deadline adjustments requested herein.

5. The unopposed and modest deadline adjustments requested herein, if granted, would not affect the currently scheduled dispositive motions hearing. and would preserve the Court's and the parties' abilities to resolve this case efficiently and on the merits. Plaintiffs do not submit this motion as a result of lack of diligence or otherwise for the purpose of unjustified delay of the trial or any proceeding, or final resolution of the case.

WHEREFORE, good cause having been shown, Plaintiffs respectfully request an order amending the case management and scheduling deadlines as set forth above. Given the imminence of the first of the affected deadlines, Plaintiffs respectively request the Court's soonest possible consideration of this motion.

Respectfully submitted,

/s/ Roger K. Gannam
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CERTIFICATE OF SERVICE

I hereby certify that on this August 14, 2019, I caused a true and correct copy of the foregoing to be filed electronically with the Court's CM/ECF system. Service upon all counsel of record will be effectuated by the Court's electronic notification system.

/s/ Roger K. Gannam
Roger K. Gannam
Attorney for Plaintiffs