

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 FOR
ONE-BUSINESS-DAY EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS
AND REQUEST FOR EXPEDITED CONSIDERATION**

Plaintiffs, for good cause shown below, and on an unopposed basis, respectfully move the Court for a final, one-business-day extension of time, to and including Monday, August 26, 2019, for all parties to file dispositive and *Daubert* motions, and leaving unchanged all other briefing deadlines under the Court’s Case Management and Scheduling Order (Dkt. 183), as amended by the Court’s Endorsed Order of August 15, 2019 (Dkt. 185). Plaintiffs show the Court good cause exists for the extension requested in this motion, as follows:

1. Since the Court’s Endorsed Order of August 15, 2019 (Doc. 185), the parties’ respective counsel have worked diligently and cooperatively to maintain the amended summary judgment briefing schedule, including by conferring several times this week regarding the possibility of narrowing summary judgment issues.

2. Despite the undersigned counsel’s best, around-the-clock efforts, however, and due to the continuing press of other matters disclosed to the Court in Plaintiffs’ prior unopposed motion to amend the briefing deadlines (Dkt. 184), Plaintiffs are not in a position to provide the Court sufficiently thorough and concise briefing on the important matters at issue within the current

briefing schedule. An additional one business day, to and including Monday, August 26, 2019, will provide the necessary time to complete appropriately organized and polished briefing.

3. 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 extension requested herein.

4. The unopposed and modest extension requested herein, if granted, would not affect the remainder of the briefing schedule or 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. Indeed, Plaintiffs would not be requesting this additional extension unless absolutely necessary.

WHEREFORE, good cause having been shown, Plaintiffs respectfully request a one-business-day extension of time, to and including Monday, August 26, 2019, for all parties to file dispositive and *Daubert* motions. Given the imminence of the current deadline (today), Plaintiffs respectfully 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 23, 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