

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

)	
FATMA MAROUF AND BRYN ESPLIN,)	
a married couple,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No. 1:18-cv-378 (APM)
)	
ALEX AZAR, in his official capacity as)	
Secretary of the UNITED STATES)	
DEPARTMENT OF HEALTH AND HUMAN)	
SERVICES, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	

**CONSENT MOTION FOR EXTENSION
OF DISCOVERY DEADLINE**

Pursuant to Local Rule 7(m), Plaintiffs, Federal Defendants, and Defendant United States Conference of Catholic Bishops (collectively, the “Parties”) jointly move for an extension of a deadline for discovery. In support of this motion, the Parties state as follows:

1. Pursuant to the Scheduling Order, the Parties must seek an extension of a discovery deadline therein by motion; there have been no prior extensions requested or granted. *See* ECF No. 55.
2. The current deadline for service of written discovery requests is November 13, 2019. ECF No. 55 at ¶ 1(D).
3. Defendants requested from Plaintiffs an extension of their time to respond to the written discovery requests propounded by Plaintiffs, from October 21, 2019, to November 4, 2019, with respect to Plaintiffs’ Requests for Production of Documents,

and from the October 28, 2019, to November 7, 2019, with respect to Plaintiffs' Interrogatories.

4. Plaintiffs are willing to grant Defendants' requested extension on the condition that the deadline for service of written discovery requests set forth in the Scheduling Order is extended by a comparable amount of time.
5. Accordingly, all Parties move to extend the deadline for service of written discovery requests from November 13, 2019, to November 27, 2019.
6. Extending the written discovery request service deadline would permit the Parties sufficient time to assess any additional discovery needs and potentially narrow the issues sought through written discovery after responses to the initial written discovery requests are produced. Accordingly, good cause exists to justify the Parties' request that the deadline for service of written discovery requests be extended by two weeks, to November 27, 2019.

WHEREFORE, the Parties respectfully request that the Court extend the deadline for discovery.

Dated: October 17th, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2019, a true and correct copy of the foregoing Consent Motion was filed using the Court's CM/ECF system, which will serve all counsel of record.

By: /s/ Kenneth Y. Choe
Kenneth Y. Choe (pro hac vice)

