

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STACY BAILEY,	§	
PLAINTIFF	§	
	§	
VS.	§	
	§	CIVIL ACTION NO. 3:18-CV-01161-L
MANSFIELD INDEPENDENT	§	
SCHOOL DISTRICT, DR. JIM	§	
VASZAUSKAS, AND DR. KIMBERLY	§	
CANTU	§	
DEFENDANTS	§	
	§	

**AGREED MOTION FOR EXTENSION OF TIME
TO FILE DEFENDANTS' ORIGINAL ANSWER**

TO THE HONORABLE JUDGE:

Defendants Mansfield Independent School District and Dr. Jim Vaszauskas file this Agreed Motion for an Extension of Time to File Defendants' Original Answer in this case. In support thereof, Defendants respectfully shows the Court as follows.

1. On December 20, 2019, Plaintiff and Defendants filed their Joint Status Report in this proceeding.
2. Plaintiff and Defendants agreed in that Joint Status Report that Defendants would have until January 17, 2020 to file their Original Answer in this cause. (Doc. 32, ¶12, pg. 5). Plaintiff's and Defendants' counsel have had further discussions since that filing, and both agree that the Answer date should be extended to March 2, 2020.
3. Defendants therefore request this agreed extension of time to file their Original Answer until March 2, 2020.
4. Counsel for Plaintiff does not object to this Motion.

WHEREFORE, PREMISES CONSIDERED for the reasons stated, Defendants Mansfield Independent School District and Dr. Jim Vaszauskas respectfully request the Court grant an extension for the Defendants to file their Original Answer on or before March 2, 2020; and that Defendants have such other further relief to which they may be justly entitled.

Dated this 16th day of January 2020.

Respectfully submitted,

/s/ Thomas E. Myers

Thomas E. Myers

State Bar No.14765450

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ATTORNEY FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

On January 9 and 16, 2020, the undersigned counsel for Defendant Mansfield Independent School District conferred with Jason Smith, counsel for Plaintiff, regarding relief requested in this Motion. Counsel for Plaintiff stated that Plaintiff does not oppose the relief requested.

/s/ Thomas E. Myers
Thomas E. Myers

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2020, a copy of this pleading was served upon counsel for Plaintiff using the court's CM/ECF system which will provide a notice of electronic filing to the following counsel of record of consent in writing to accept this notice of service of this document by electronic means:

Jason C.N. Smith
Law Offices of Jason Smith
600 Eighth Ave
Fort Worth, TX 76104

Via Electronic Service

/s/ Thomas E. Myers
Thomas E. Myers

