

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JENNIFER ELLER,

Plaintiff,

v.

PRINCE GEORGE'S COUNTY PUBLIC
SCHOOLS, PRINCE GEORGE'S COUNTY
BOARD OF EDUCATION and
MONICA GOLDSON,

Defendants.

Case Number: 18-cv-03649

JOINT REQUEST TO AMEND THE SCHEDULING ORDER

Plaintiff Jennifer Eller (“Plaintiff”), by and through her counsel, and Defendants Prince George’s County Public Schools, Prince George’s County Board of Education, and Monica Golson (collectively, “Defendants”), by and through their counsel, hereby jointly request the Court amend its Scheduling Order of February 26, 2019 (Doc. 28) as set forth below. The purpose of this request is to allow the Parties an additional 60 days to complete discovery. While the Parties have been working diligently in this matter to comply with discovery deadlines, they believe that the issues in the case, with multiple claims and parties, require additional time for investigation, including through expert discovery. In addition, the extension will provide the extra time that Plaintiff’s intended expert requires to prepare her report. Accordingly, the Parties jointly request that the scheduling order be amended as follows:

Proposed Deadline	Original Deadline	Deadline	Explanation for Requested Modification
July 22, 2019	May 22, 2019	Plaintiff's Rule 26(a)(2) expert disclosures	The requested modification of an additional sixty days will assist the parties in completing necessary discovery.
August 19, 2019	June 19, 2019	Defendant's Rule 26(a)(2) expert disclosures	The requested modification of an additional sixty days will assist the parties in completing necessary discovery.
September 3, 2019	July 3, 2019	Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	The requested modification of an additional sixty days will assist the parties in completing necessary discovery.
September 9, 2019	July 10, 2019	Rule 26(e)(2) supplementation of disclosures and responses	The requested modification of an additional sixty days will assist the parties in completing necessary discovery.
November 19, 2019	September 20, 2019	Completion of Discovery; submission of Post-Discovery Joint Status Report	The requested modification of an additional sixty days will assist the parties in completing necessary discovery.
November 26, 2019	September 27, 2019	Requests for admission	The requested modification of an additional sixty days will assist the parties in completing necessary discovery.

Courts have “considerable discretion in managing and modifying the timing of pretrial discovery and other scheduling matters.” *Brey Corp. v. LQ Mgmt., L.L.C.*, No. AW-11-CV-00718-AW, 2012 WL 3127023, at *2 (D. Md. July 26, 2012). Given that the parties are jointly requesting this limited extension of the discovery deadlines at an early stage of the litigation, none of the parties will be negatively affected by the entry of a 60-day extension.

For the foregoing reasons, the parties respectfully request amend its Scheduling Order of February 26, 2019 as set forth above.

Dated this 16th day of May, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Thomas McSorley
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**[PROPOSED] ORDER GRANTING THE PARTIES' JOINT REQUEST
TO AMEND THE SCHEDULING ORDER**

This matter comes before the Court on the Parties' Joint Request to Amend the Scheduling Order, filed on May 16, 2019. Having reviewed the papers and being fully advised, the Court **GRANTS** the request for good cause shown.

Accordingly, it is hereby **ORDERED** that:

1. The case shall proceed in accordance with the following schedule:

July 22, 2019	Plaintiff's Rule 26(a)(2) expert disclosures
August 19, 2019	Defendant's Rule 26(a)(2) expert disclosures
September 3, 2019	Plaintiff's rebuttal Rule 26(a)(2) expert disclosures
September 9, 2019	Rule 26(e)(2) supplementation of disclosures and responses
November 19, 2019	Completion of Discovery; submission of Post-Discovery Joint Status Report
November 26, 2019	Requests for admission

2. All additional provisions in the February 26, 2019 Scheduling Order shall remain in effect.

SO ORDERED on this ____ day of _____, 2019.

THEODORE D. CHUANG
United States District Judge