

**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 May 17, 2019 (Doc. 31) as set forth below. The purpose for this request is to allow the Parties an additional two weeks to complete discovery requirements related to expert disclosures. The extension will provide the extra time that Plaintiff's intended expert requires to prepare her report. The proposed modification would not alter the deadlines for the completion of discovery or requests for admission. Accordingly, the Parties jointly request that the scheduling order be amended as follows:

Proposed Deadline	Original Deadline	Deadline	Explanation for Requested Modification
August 5, 2019	July 22, 2019	Plaintiff's Rule 26(a)(2) expert disclosures	The requested modification of an additional two weeks will grant the extra time that Plaintiff's intended expert requires to prepare her report.
September 3, 2019	August 19, 2019	Defendant's Rule 26(a)(2) expert disclosures	The requested modification of an additional two weeks will grant the extra time that Plaintiff's intended expert requires to prepare her report.
September 17, 2019	September 3, 2019	Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	The requested modification of an additional two weeks will grant the extra time that Plaintiff's intended expert requires to prepare her report.
September 23, 2019	September 9, 2019	Rule 26(e)(2) supplementation of disclosures and responses	The requested modification of an additional two weeks will grant the extra time that Plaintiff's intended expert requires to prepare her report.
November 19, 2019	November 19, 2019	Completion of Discovery; submission of Post-Discovery Joint Status Report	No change.
November 26, 2019	November 26, 2019	Requests for admission	No change.
December 3, 2019	July 17, 2019	Notice of Intent to File a Pretrial Dispositive Motion, see Case Management Order Part II.A	This deadline was inadvertently omitted from prior motions and, therefore, not extended. The parties seek to reset this deadline.

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 expert-related discovery deadlines at an early stage of the litigation, none of the parties will be negatively affected by the entry of a two-week extension.

For the foregoing reasons, the parties respectfully request amend its Scheduling Order of May 17, 2019 as set forth above.

Dated this 19 day of July 2019.

Respectfully submitted,

/s/ Amit Sharma

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CERTIFICATE OF SERVICE

I hereby certify that on July 19, 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/ Paul Pompeo
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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 July 19, 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:

August 5, 2019	Plaintiff's Rule 26(a)(2) expert disclosures
September 3, 2019	Defendant's Rule 26(a)(2) expert disclosures
September 17, 2019	Plaintiff's rebuttal Rule 26(a)(2) expert disclosures
September 23, 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
December 3, 2019	Notice of Intent to File a Pretrial Dispositive Motion

2. All additional provisions in the May 17, 2019 Scheduling Order shall remain in effect.

SO ORDERED on this 19 day of July, 2019.

THEODORE D. CHUANG
United States District Judge