

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JENNIFER ELLER,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 18-cv-03649-TDC/TJS
)	
PRINCE GEORGE’S COUNTY)	
PUBLIC SCHOOLS, ET AL.,)	
)	
Defendants.)	
_____)	

CONSENT MOTION TO EXTEND DEADLINES

Defendants Prince George’s County Public Schools, Board of Education of Prince George’s County, and Monica Goldson (“Defendants”), by and through undersigned counsel, respectfully move the Court pursuant to Fed. R. Civ. P. 6(b)(1), to extend the remaining deadlines and in support, state the following:

1. The current remaining deadlines are as follows:

Close of Discovery	February 13, 2020
Joint Status Report	February 13, 2020
Request for Admissions	February 20, 2020
Notice of Intent to File Dispositive Motions	March 16, 2020

2. On January 13, 2020, Plaintiff propounded her Rule 30(b)(6) Notice of Deposition and Plaintiff’s First Set of Interrogatories to Defendants.

3. However, due to undersigned counsel’s schedule, Defendants require additional time to prepare and produce witnesses in response to the Rule 30(b)(6) Notice and provide Answers to Interrogatories.

4. As a result, Defendants request that the deadline for the completion of discovery

be extended by thirty (30) days for the sole purpose of conducting Rule 30(b)(6) depositions pursuant to the notice served by Plaintiff on January 13, 2020.

5. Defendants request that the remaining deadlines be extended as follows:

Close of Discovery	March 16, 2020
Joint Status Report	March 16, 2020
Request for Admissions	March 23, 2020
Notice of Intent to File Dispositive Motions	April 15, 2020

6. Plaintiff graciously consents to the relief requested herein and has also agreed to allow Defendants an additional week, to February 19, 2020, to respond to the interrogatories served January 13, 2020.

WHEREFORE, Defendants respectfully move to extend the remaining deadlines by thirty (30) days, and any other relief deemed just.

Respectfully submitted,

/s/ James E. McCollum, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via the Court's CM/ECF system on this 13th day of February, 2020, to:

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