

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

JENNIFER ELLER,

*Plaintiff,*

v.

PRINCE GEORGE'S COUNTY PUBLIC  
SCHOOLS, et al.,

*Defendants.*

Case No. 18-cv-03649

**CONSENT MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 105.9, Plaintiff Jennifer Eller, by and through the undersigned counsel, hereby moves to extend the remaining discovery deadlines by twenty-eight (28) days, as outlined below. As reasons therefor, Plaintiff avers as follows:

1. On February 13, 2020, Defendants, with Plaintiff's consent, moved to extend the remaining discovery deadlines in this case in order "to prepare and produce witnesses in response to the Rule 30(b)(6) Notice and provide Answers to Interrogatories." ECF No. 52.

2. On February 13, 2020, the Court extended the remaining discovery deadlines, ECF No. 53, as follows:

March 16, 2020	Close of discovery; submission of status report
March 23, 2020	Requests for admissions
April 15, 2020	Notice of intent to file a dispositive pretrial motion

3. Since then, Plaintiff has deposed three witnesses designated by Defendant Prince George's County Public Schools ("PGCPS") as corporate representatives, pursuant to Federal Rule of Civil Procedure 30(b)(6).

4. In addition, Defendant PGCPS has identified an additional three witnesses pursuant to Rule 30(b)(6), whose depositions were scheduled for March 16, 2020, in response to Plaintiff's Notice of Deposition Pursuant to Rule 30(b)(6).

5. More specifically, on March 16, 2019, Plaintiff was scheduled to take the depositions of Robin Welsh, Cindy Gilday, and Laurie Tranmer, as corporate representatives for Defendant PGCPS.

6. However, since the Court issued its order on February 13, 2020 and the parties scheduled the depositions, the coronavirus (COVID-19) pandemic has worsened in the United States and led to the limited closure of this Court, as well as the offices of undersigned counsel.

7. Further, pursuant to federal and state governmental guidance and directives, it is recommended that people engage in social distancing in order to avoid the spread of COVID-19. *See* Second Amended Standing Order 2020-03, *In re: Court Operations Under Exigent Circumstances Created by COVID-19*, at 1 (D. Md. Mar. 14, 2020) (noting that "preventing the spread of COVID-19 requires limiting public contact to essential matters").

8. In response to the COVID-19 pandemic, the Court has already, *inter alia*, extended all filing deadlines between March 16, 2020 and March 30, 2020 by fourteen (14) days. *See* Second Amended Standing Order 2020-03, at 1.

9. In light of current governmental guidance to exercise social distancing, the inability of Plaintiff's counsel to ascertain the health of or risk of transmission posed by witnesses, reporters, and counsel, and in keeping with the spirit of the Court's Second Amended Standing Order 2020-

03, Plaintiff hereby requests the Court extend the remaining discovery deadlines for purposes of deposing Defendant PGCP's current Rule 30(b)(6)-designated witnesses (i.e., Robin Welsh, Cindy Gilday, and Laurie Tranmer), as follows:

April 13, 2020	Close of discovery; submission of status report
April 20, 2020	Requests for admissions
May 11, 2020	Notice of intent to file a dispositive pretrial motion

10. Counsel for Defendants consents to the relief requested herein.

For the foregoing reasons, Plaintiff respectfully moves to extend the discovery deadlines by twenty-eight (28) days, as outlined herein.

Dated this 16th of March, 2020.

Respectfully submitted,

/s/ Tom McSorley

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**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Maryland that on March 16, 2020, I caused a true and correct copy of the foregoing document to be served via the Court's CM/ECF system on the following counsel of record for Defendants:

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/s/ Tom McSorley  
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