

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.)
 _____)

DEFENDANTS’ MOTION TO EXTEND DEADLINES

Defendants Prince George’s County Public Schools, Board of Education of Prince George’s County (“Board”), and Monica Goldson (“Defendants”), by and through undersigned counsel, respectfully move the Court pursuant to Fed. R. Civ. P. 6(b)(1), and the Court’s Order dated May 20, 2020 [ECF No. 65], to extend the remaining deadlines by thirty (30) days. In support of this motion, Defendants state the following:

1. On May 20, 2020, the Court issued its Order [ECF No. 65] granting in part Plaintiff’s Motion for Extension of Time and Adjustment of Scope of the Remaining Discovery Period [ECF No. 64].
2. Defendants were graciously afforded until June 16, 2020, to search for and provide responsive documents that were not previously produced from a list of eighty-seven (87) “custodians” consisting of former and current Board employees and several former students.
3. While many of the “custodians” do not have responsive documents, Defendants have produced to Plaintiff the documents that have been provided thus far. However, several issues remain.
4. Of the eighty-seven (87) custodians, Defendants are unable to identify six (6) former

employees referenced by Plaintiff and continue to try to identify these individuals in order to perform searches.

5. In addition, five (5) current employees have not responded to Defendants' requests. Therefore, these employees' e-mails accounts will need to be disabled so that Defendants may perform searches. However, Defendants are reluctant to do so until the close of the school year as the employees' ability to enter grades and other end of the year material will be impacted.

6. Furthermore, on June 3, 2020, Plaintiff provided Defendants with a list of terms that she requests should be searched by Defendants and its employees. Defendants require additional time to complete these tasks.

7. As a result, Defendant requests a thirty (30) day extension to complete its search and production up to and including July 16, 2020, and modification of the remaining deadlines as follows:

July 16, 2020	Deadline for Defendants to Complete Production
August 13, 2020	Close of discovery; submission of status report
August 20, 2020	Requests for admissions
October 1, 2020	Notice of intent to file dispositive pretrial motion

WHEREFORE, Defendants respectfully request that their Motion to Extend Deadlines be granted, 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 16th day of June, 2020, to:

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