

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

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

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE DEFENDANTS’
RESPONSE TO PLAINTIFF’S MOTION FOR DISCOVERY SANCTIONS**

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 deadline to file a response to Plaintiff’s Motion for Discovery Sanctions up to and including September 7, 2020. In support of this motion, Defendants state the following:

1. On or about August 12, 2020, this court issued a Paperless Order whereby it granted Plaintiff leave to file a Motion for Discovery Sanctions.
2. Pursuant to the August 12, 2020 Order, Defendant’s response is due by August 31, 2020.
3. Undersigned counsel is scheduled to be in depositions the remaining of this week. In addition and despite Defendants’ best efforts, Defendants have not been able to obtain transcripts. Undersigned counsel expects to have the transcripts by the end of this week.
4. Defendants require additional time review material and prepare and file a response to Plaintiff’s motion.

5. This brief extension of one (1) week, up to and including September 7, 2020, will not result in any unjust delay of this proceeding, nor will it result in prejudice to any party. There is no trial date scheduled for this case. In fact, Parties agree that the case will go to mediation before a U.S. Magistrate Judge.

6. Counsel for Plaintiff does not oppose this request for extension on the condition that, if granted, the Court also extend the deadline for Plaintiff's reply brief in support of the motion for sanctions to September 18, 2020.

WHEREFORE, Defendants respectfully move to extend the deadline to file a response to Plaintiff's Motion for Discovery Sanctions up to and including September 7, 2020, and any other relief deemed just.

Dated: August 27, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first-class mail, this 27th day of August, 2020, to:

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