

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

GERALD LYNN BOSTOCK,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO: 1:16-cv-01460-ELR-WEJ
CLAYTON COUNTY,)	
)	
Defendant.)	

JOINT MOTION FOR EXTENSION OF DISCOVERY PERIOD

COME NOW the parties and jointly move the Court to enter an order extending the discovery deadline in this case by 60 days. The reasons for this joint motion are as follows:

1. The Court previously extended the discovery deadline in this case to June 21, 2021. (Doc. 64.)
2. The parties have propounded and responded to written discovery, produced documents, are continuing to confer with respect to alleged discovery deficiencies, have conducted depositions, and are in the process of setting dates for additional depositions.
3. The parties anticipate taking a number of additional depositions, some of which are anticipated to include state court personnel. Additionally, since the

Court's last order on discovery, a large volume of emails (approximately 10,000) have been produced. In addition to the review process, which may identify additional parties whose depositions are needed, the parties anticipate further discussions on the issue of search terms and custodians.

4. Additionally, Plaintiff has moved to further amend his complaint to add a charge of retaliation. Plaintiff's objections to the Magistrate Judge's order denying Plaintiff's motion are currently pending before the District Court. If Plaintiff ultimately is successful in his motion to file a Third Amended Complaint, the parties anticipate they will need to conduct further discovery on the retaliation claim.

5. Accordingly, the parties are jointly requesting an additional sixty (60) day extension of discovery to allow them to address all outstanding issues and complete discovery.

6. This is the second request for an extension of the discovery period in this case, and it is not made for any improper purpose or to unduly delay proceedings. The parties do not anticipate seeking a further extension absent currently unforeseen circumstances.

7. For the reasons stated herein, the parties respectfully request that the discovery period in this case be enlarged for sixty (60) days through August 20, 2021.

8. A proposed Order granting this request for an extension is submitted with this motion.

Respectfully submitted this 7th day of June 2021.

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CERTIFICATE OF COMPLIANCE

The undersigned certifies that the foregoing has been prepared in Times New Roman 14 font, as approved by the Court in LR 5.1B.

/s/ Thomas J. Mew
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CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2021, I electronically the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

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ORDER

Having read and considered the parties' Joint Motion to Extend Discovery Period, and good cause having been shown, the parties' motion is GRANTED. The discovery period in this matter is extended through and including August 20, 2021. All other deadlines are adjusted accordingly.

SO ORDERED this _____ day of _____, 2021.

HON. WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE