

**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 ADDITIONAL 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 30 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), then to August 20, 2021(Doc. 70), then to October 19, 2021.
2. The parties have propounded and responded to written discovery, produced documents, are continuing to confer with respect to alleged discovery deficiencies, and have conducted numerous depositions.
3. The parties had set Plaintiff’s deposition for October 6, 2021 and the deposition of John Johnson for October 14, 2021. The parties were present and

prepared to begin Plaintiff's deposition on October 6, 2020¹ when they discovered a court reporter's violation of office COVID-19 protocol. Defendant's counsel attempted to secure a substitute court reporter for that day but was unable to do so. Accordingly, for the safety of the parties and the witness, the parties agreed to reschedule Plaintiff's deposition for October 14, 2021, when John Johnson was to have been deposed. Plaintiff has now been deposed and the parties are working in good faith to reset Mr. Johnson's deposition as soon as possible.

4. The parties acknowledge that they previously sought a final extension of the discovery period and that they did not intend to seek any further extensions. Based on the unforeseen circumstances described herein, however, the parties respectfully request that the Court grant them a final thirty (30) day extension of the discovery period.

7. For the reasons stated herein, the parties respectfully request that the discovery period in this case be enlarged for thirty (30) days through November 18, 2021.

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

Respectfully submitted this 15th day of October 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 October 15, 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 for Additional Extension of Discovery Period, and good cause having been shown, the parties' motion is GRANTED. The discovery period in this matter is extended through and including November 18, 2021. All other deadlines are adjusted accordingly.

SO ORDERED this ____ day of _____, 2021.

HON. WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE