

**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 LIMITED 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 4 days to November 22, 2021, for the limited purpose of Plaintiff taking the deposition of John Johnson. The reasons for this joint motion are as follows:

1. The Court previously extended the discovery deadline in this case to the current deadline of November 18, 2021. (Docs. 64, 70, 80, 91).
2. 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, 2021 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.

3. The parties have been working to reset Mr. Johnson's deposition. Plaintiff has served Mr. Johnson with a deposition subpoena for November 12, 2021. Mr. Johnson, however, will be out of the country on that date due to previously scheduled travel. Mr. Johnson is available to be deposed on November 22, 2021.

4. For the reasons stated herein, the parties respectfully request that the discovery period in this case be enlarged for four (4) days through November 22, 2021, for the limited purpose of Plaintiff taking the deposition of John Johnson.

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

Respectfully submitted this 3rd day of November 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.

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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2021, I electronically filed 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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 CLAYTON COUNTY,)
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ORDER

Having read and considered the parties' Joint Motion for Limited Extension of Discovery Period, and good cause having been shown, the parties' motion is GRANTED. The discovery period in this matter is extended from November 18, 2021 through and including November 22, 2021 for the limited purpose of Plaintiff taking the deposition of John Johnson. All other deadlines are adjusted accordingly.

SO ORDERED this _____ day of _____, 2021.

HON. WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE