

**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.)	

**CONSENT MOTION FOR EXTENSION OF DEADLINE
FOR FILING OF DISPOSITIVE MOTIONS**

COME NOW the parties and jointly move the Court to enter an order extending the deadline for the filing of dispositive motions from March 7, 2022 through and including March 21, 2022. In support of this motion, the parties respectfully show as follows:

1.

Pursuant to the Court’s January 12, 2022 Order (Doc. 108), the Court re-opened discovery for the limited purpose of allowing Plaintiff to depose Paul Holland on or before February 4, 2022. Pursuant to the Court’s 1/12/22 Order, the current deadline for filing dispositive motions is March 7, 2022. (Id.).

2.

The parties need additional time to prepare dispositive motions due to other case-related commitments. In addition, counsel for both parties have discussed the possibility of resolving this matter without the need for further judicial involvement and very recently have engaged in additional settlement discussions to this end. The requested extension of the deadline for filing dispositive motions would give the parties additional time to explore resolution without incurring fees and expenses in preparing and briefing dispositive motions.

3.

Accordingly, the parties seek an extension of the dispositive motion deadline through and including Monday, March 21, 2022. This extension is not sought for the purpose of delaying this case, is necessary for the reasons stated herein, and is for the mutual convenience of the parties in preparing this case for trial. All parties consent to this request for extension.

WHEREFORE, the parties respectfully move the Court for an extension of the dispositive motion deadline through and including **March 21, 2022**. A Proposed Order is attached for the Court's convenience.

Respectfully submitted, this 1st day of March 2022.

CONSENTED TO BY:

/s/ Thomas J. Mew, IV

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/s/ Jack R. Hancock

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Counsel for Defendant

CERTIFICATE OF COMPLIANCE

I hereby certify that the within and foregoing **CONSENT MOTION FOR EXTENSION OF DEADLINE FOR FILING DISPOSITIVE MOTIONS** has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

This 1st day of March, 2022.

/s/ Jack R. Hancock _____

Jack R. Hancock

Georgia Bar No. 322450

CERTIFICATE OF SERVICE

I hereby certify that I served the attached notice and subpoena on the witness or his/her agent and have electronically filed the foregoing **CONSENT MOTION FOR EXTENSION OF DEADLINE FOR FILING DISPOSITIVE MOTIONS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

Thomas J. Mew, IV
Edward D. Buckley
Andrew Beal
Rachel Berlin Benjamin
Buckley Beal LLP
600 Peachtree Street, NE, Suite 3900
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This 1st day of March, 2022.

FREEMAN MATTHIS & GARY, LLP

/s/ Jack R. Hancock _____

Jack R. Hancock

Georgia Bar No. 322450

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ORDER

This matter is before the Court on the parties' Consent Motion for Extension of Deadline for Filing Dispositive Motions. Upon consideration, and for good cause shown, the parties' Consent Motion is **GRANTED**. The deadline for filing dispositive motions is hereby extended through and including **March 21, 2022**.

SO ORDERED, this ____ day of March, 2022.

WALTER E. JOHNSON
UNITED STATES MAGISTRATE JUDGE