

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MARK HORTON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-CV-2324
)	
MIDWEST GERIATRIC)	
MANAGEMENT, LLC,)	
)	
Defendant.)	

**DEFENDANT MIDWEST GERIATRIC MANAGEMENT, LLC’S SUPPLEMENT TO
MOTION FOR LIMITED MODIFICATION OF SCHEDULING ORDER**

COMES NOW Defendant Midwest Geriatric Management, LLC (“MGM”), by and through its undersigned counsel, and for its Supplement to Motion for Limited Modification of Scheduling Order, respectfully states as follows:

1. In its Motion for Limited Modification of Scheduling Order (Dkt. 62.), MGM reported two timely noticed depositions that, through no fault of MGM, were likely to occur in January 2022: (i) the deposition of Plaintiff’s husband, Alton Greenough; and (ii) the deposition of Celtic Healthcare.

2. As to the deposition of Mr. Greenough, counsel for the parties have continued conferring on dates. MGM has proposed January 20 and 21, 2022, for the deposition, and is awaiting confirmation from Plaintiff and Mr. Greenough regarding one of those dates.

3. As to the deposition of Celtic Healthcare, counsel for MGM reached out to, and has successfully connected with, outside counsel for Celtic Healthcare, who expressed Celtic Healthcare’s intention to cooperate with MGM regarding the subpoena. As a result, it does not appear that a motion to compel will be necessary. The deposition of Celtic Healthcare is likely to occur later this month or early next month.

4. As a result, MGM respectfully submits that modification of the operative Second Amended Case Management Order (Dkt. 56), as requested by MGM in its Motion for Limited Modification of Scheduling Order (Dkt. 62), is appropriate, and would provide adequate time to address these outstanding issues and enable the case to proceed orderly thereafter.

Dated: January 7, 2022

Respectfully submitted,

LEWIS RICE, LLC

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