

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

BETHEL MINISTRIES, INC.,	)	
	)	
	)	
<i>Plaintiff,</i>	)	
	)	Case No. 1:19-cv-01853-SAG
DR. KAREN B. SALMON, et al.,	)	
	)	
	)	
<i>Defendants.</i>	)	
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**JOINT CONSENT MOTION TO EXTEND DEADLINES**

The parties move pursuant to Fed. R. Civ. P. 6 for an extension of time to file Plaintiff's Petition for Attorneys' Fees, Costs, and Expenses and Defendants' response to Plaintiff's Petition. On December 10, 2021, this Court issued its Opinion and Order on the parties' cross-motions for summary judgment, ruling in Plaintiff's favor. Plaintiff's Petition is currently due January 10, 2022.

Since that time, the parties began negotiations to resolve the issue of attorneys' fees. Out of respect for judicial time and resources, and in light of the prospect of a non-judicial resolution of the fee issue, the parties now respectfully request an extension of the deadlines, with Plaintiff's Petition due January 31 and Defendant's response due March 2, 2022, respectively.

This brief extension will allow the parties to continue their good faith negotiations in hopes of resolving the issue of attorneys' fees without incurring additional costs and will prevent any unnecessary expenditure of judicial resources.

## CONCLUSION

WHEREFORE, for the reasons stated herein, the parties ask the Court to grant their motion to extend the deadline for Plaintiff to file a Petition for Attorneys' Fees, Costs, and Expenses to January 31, 2022, and the deadline for Defendants to file a response to March 2, 2022.

Respectfully submitted this 4th day of January, 2022.

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*Attorneys for State Defendants*

**CERTIFICATE OF SERVICE**

I certify that on this 4th day of January, 2022, the foregoing was served by CM/ECF on all registered CMF users.

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BETHEL MINISTRIES, INC., )

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*Plaintiff,* )

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Case No. 1:19-cv-01853-SAG

DR. KAREN B. SALMON, et al., )

)

)

*Defendants.* )

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**ORDER**

Upon consideration of the parties’ Joint Consent Motion to Extend Deadlines to file Plaintiff’s petition for fees, costs, and expenses and Defendants’ response, the Court hereby grants the motion.

The deadline for Plaintiff’s petition is January 31, 2022, and Defendants’ response deadline is March 2, 2022.

Date:

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Judge Stephanie A. Gallagher  
United States District Judge