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Counsel for Defendant

14 *Counsel for Plaintiff*
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16 **UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF ARIZONA**

18 John Doe, by his guardian and next
19 friend, Susan Doe,

20 Plaintiff,

21 vs.

22 Jami Snyder, Director of the Arizona
23 Health Care Cost Containment System,
24 in her official capacity,

25 Defendant.

No. 4:20-cv-00335-TUC-SHR

**STIPULATED MOTION TO
EXTEND DISCOVERY
DEADLINES**

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1 Pursuant to Federal Rule of Civil Procedure 16, Plaintiff John Doe, by his guardian and
 2 next friend, Susan Doe, and Defendant Jami Snyder (collectively, the “Parties”) jointly move the
 3 Court for an order modifying the establishing deadlines in this litigation through the filing of
 4 motions for summary judgment and motions to exclude expert testimony. In support of their
 5 motion, the Parties state as follows:

6 1. On April 8, 2022, the Court entered the Parties’ proposed scheduling order setting
 7 deadlines for expert discovery and dispositive motions. Since then, the Parties have continued to
 8 work cooperatively and move the litigation forward.

9 2. Due to unexpected and urgent issues arising in other matters, Plaintiff’s counsel
 10 sought Defendant’s consent to extend the deadlines for expert discovery by approximately one
 11 month. This adjustment to the schedule has the added benefit of allowing the Parties to complete
 12 any lingering fact discovery that may remain open following the resolution of Plaintiff’s motion
 13 to compel, as noted in the Parties’ prior stipulation, *see* Doc. 147 at ¶ 3.

14 3. Defendant consents to this extension.

15 4. The Parties have agreed upon the following modified deadlines:

<i>Event</i>	<i>Current Date</i>	<i>Proposed Date</i>
Opening expert reports	May 13	June 24
Responsive expert reports	June 10	July 22
Reply expert reports	July 1	August 12
Close of expert discovery	September 23	September 23
Motions for summary judgment and to exclude expert testimony	September 9	October 21

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 22 5. The Parties believe the schedule set forth above best serves their needs and the
 23 interest of judicial economy.

24 THEREFORE, the Parties respectfully request the Court enter the attached order
 25 modifying the existing deadlines for expert discovery through the filing of motions for summary
 26 judgment and motions to exclude expert testimony.

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DATED: May 13, 2022

Respectfully submitted,

PERKINS COIE LLP

s/ Janet M. Howe

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2022, I electronically transmitted the attached documents to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

John Doe, by his guardian and next friend, Susan Doe,

Plaintiff,

vs.

Jami Snyder, Director of the Arizona Health Care Cost Containment System, in her official capacity,

Defendant.

No. 4:20-cv-00335-TUC-SHR

**[PROPOSED] ORDER
GRANTING PLAINTIFF'S
MOTION TO COMPEL**

The Court, having considered the Parties' Stipulated Motion to Extend Discovery Deadlines (the "Motion") and for good cause shown, **IT IS ORDERED** that the Motion is **GRANTED**.

IT IS FURTHER ORDERED that the following deadlines are established:

<i>Event</i>	<i>Date</i>
Opening expert reports	June 24
Responsive expert reports	July 22
Reply expert reports	August 12
Close of expert discovery	September 23
Motions for summary judgment and to exclude expert testimony	October 21