

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**L.E., by his next friends and parents,)
SHELLEY ESQUIVEL and)
MARIO ESQUIVEL,)**

Plaintiff,)

v.)

**BILL LEE, in his official capacity as)
Governor of Tennessee; et al.,)
SCHWINN, in her official capacity as)**

**KNOX COUNTY BOARD)
OF EDUCATION)
a/k/a KNOX COUNTY SCHOOL)
DISTRICT; ROBERT M. “BOB”)
THOMAS, in his official capacity as)
Director of Knox County Schools,)**

Defendants.)

No. 3:21-cv-00835

Chief Judge Crenshaw

Magistrate Judge Newbern

MOTION FOR EXTENSION

Defendants Governor Lee, Commissioner Schwinn, Dr. Morrison and members of the Tennessee State Board of Education, in their official capacities, and the Tennessee State Board of Education (“State Defendants”) respectfully request for one additional day, or until June 22, 2022 to complete production of all written discovery responsive to outstanding discovery requests. The undersigned has made every effort to complete production but needs the requested time to carefully review documents that are potentially privileged under attorney-client, attorney work-product, and deliberative process.

Respectfully Submitted,

HERBERT H. SLATERY III
Attorney General and Reporter

s/ Stephanie A. Bergmeyer

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*Attorney for Governor Lee, Commissioner
Schwinn, Dr. Morrison, and the individual
members of the Tennessee State Board of
Education, in their official capacities, and
the Tennessee State Board of Education*

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of this Motion for Extension has been served through the e-filing system on June 21, 2021, to:

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