

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>)	
_____)	

JOINT CONSENT MOTION TO DEFER 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. The parties have reached a preliminary agreement to resolve Plaintiffs’ claims for attorneys’ fees, costs, and expenses. This agreement is scheduled to be considered by the Maryland Board of Public Works at its May 11, 2022, meeting.

Plaintiff’s Petition is currently due on April 26, 2022, and Defendants’ response is due May 27, 2022. The parties now jointly ask this Court to defer each of these deadlines by 60 days, to June 27, 2022, and July 27, 2022, respectively. This will allow time for the Board of Public Works to act upon the settlement agreement. If the Board approves the settlement, the parties expect the settlement to be paid within 30 days.

The parties request this deferral out of respect for judicial time and resources, and in light of the probability of a non-judicial resolution of the fee issue. It will allow the parties to finalize their good faith negotiations and resolve the attorneys’ fees, costs, and expenses issue without incurring additional costs.

CONCLUSION

WHEREFORE, for the reasons stated herein, the parties ask the Court to defer their motion to suspend the deadline for Plaintiff to file a Petition for Attorneys' Fees, Costs, and Expenses to June 27, 2022, and the deadline for defendants' response to July 27, 2022.

Respectfully submitted this 25th day of April, 2022.

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Attorneys for State Defendants

CERTIFICATE OF SERVICE

I certify that on this 25th day of April, 2022, the foregoing was served by CM/ECF on all registered CMF users.

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)

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Defendants.)

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ORDER

Upon consideration of the parties' Joint Consent Motion To Defer Deadlines To Obtain Approval of Settlement, the Court hereby grants the motion.

Plaintiff's Petition shall be due June 27, 2022, and Defendants' Response shall be due July 27th, 2022.

Date:

Judge Stephanie A. Gallagher
United States District Judge