

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.* *

Plaintiffs, *

v. * Civil Action No.: 1:22-cv-00865-SAG

ANNE ARUNDEL COUNTY, MD *

Defendant. *

* * * * *

JOINT REQUEST TO MODIFY THE SCHEDULING ORDER

Defendant, Anne Arundel County, Maryland (the “County”), by and through undersigned counsel, and Plaintiffs, by the through their undersigned counsel, submit this Joint Request to Modify the Scheduling Order and state as follows:

1. While the parties have diligently been working through discovery in this case, there have been some scheduling conflicts, including but not limited to scheduling conflicts with persons to be designated as an expert witness, that now require additional time among the parties to complete discovery in this case; and submit substantive dispositive motions.

2. The parties have conferred and agree to the following modified scheduling order dates:

- Anne Arundel County Expert Identification and Reports: **July 29, 2022**
- Plaintiffs’ Expert Identification and Reports: **August 29, 2022**
- Completion of Discovery: **September 14, 2022**
- Plaintiffs’ motion for summary judgment: **September 29, 2022**
- Anne Arundel County’s Response and/or Cross-Motion: **October 14, 2022**
- Plaintiffs’ Reply and/or Response to Cross-Motion: **October 31, 2022**
- Anne Arundel County’s Cross-Motion Reply: **November 10, 2022**

3. This motion will not cause any delays and no party will be prejudiced.

WHEREFORE, Defendant Anne Arundel County, Maryland and Plaintiffs respectfully request that the Court modify the current scheduling order and for such other and further relief as justice and their cause may require.

Respectfully submitted,

GREGORY J. SWAIN
County Attorney

Hamilton F. Tyler

Hamilton F. Tyler, Bar No. 9423
Deputy County Attorney

Tamal A. Banton

Tamal A. Banton, Bar No. 27206
Senior Assistant County Attorney
ANNE ARUNDEL COUNTY OFFICE OF LAW
2660 Riva Road, 4th Floor
Annapolis, Maryland 21401
(410) 222-7888 telephone
(410) 222-7835 facsimile
htyler@aacounty.org
tbanton@aacounty.org
Attorneys for Defendant
Anne Arundel County, Maryland

/s/ Mark Pennak

MARK W. PENNAK
MARYLAND SHALL ISSUE, INC.
9613 Harford Rd.
Ste. C #1014
Baltimore, Maryland 21234
mpennak@marylandshallissue.org
Phone (301) 873-3671
MD Atty No. 1905150005
District Court Bar No. 210333
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of July 2022, the foregoing joint motion was electronically filed in the United States District Court for the District of Maryland.

Tamal A. Banton

Tamal A. Banton