

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. *

* * * * *

CONSENT MOTION TO MODIFY THE SCHEDULING ORDER

NOW COMES Defendant, Anne Arundel County, Maryland (the “County”), by and through undersigned counsel, and with the consent of counsel for the Plaintiffs, files this Consent Motion to Modify the Scheduling Order and state as follows:

1. While the parties have continued to diligently work through discovery in this case, scheduling conflicts arising from Plaintiffs’ disclosure of their expert on August 29, 2022, the expert’s limited availability to appear for an expert deposition until the week of September 26, 2022, and the observance of Rosh Hashanah from September 25 through September 27, now require additional time among the parties to complete the deposition of Plaintiffs’ expert. The earliest mutually agreeable date for the expert deposition is September 29, 2022, and the parties have agreed to conduct the deposition over Zoom on that date.

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

Completion of the deposition of Plaintiffs’ Expert: **September 29, 2022**

3. No other dates, including the deadlines for substantive disposition motions, will be affected by this motion. This motion will not cause any delays and no party will be prejudiced. This is the second request to modify the scheduling order.

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

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of September 2022, the foregoing motion was electronically filed in the United States District Court for the District of Maryland.

Tamal A. Banton

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