

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ANAKA HUNTER,)	
)	
Plaintiff,)	
)	
v.)	No. 4:12-CV-4 ERW
)	
BOARD OF TRUSTEES, SALEM PUBLIC)	
LIBRARY, et al.,)	
)	
Defendants.)	

CONSENT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO MAKE EXPERT DISCLOSURES

Comes now Plaintiff, with the consent of Defendants, and moves this Court to modify the Case Management Order (Doc. # 30) to allow the Plaintiff until September 28, 2012, to disclose experts and provide expert reports and until October 19, 2012, to make experts available for depositions and have depositions completed. In support, Plaintiff states:

1. Pursuant to the Case Management Order, Plaintiff must disclose any experts and provide expert reports no later than August 31, 2012, and make experts available for depositions and have depositions completed by September 14, 2012.

2. A Rule 30(b)(6) deposition of Board of Trustees, Salem Public Library was scheduled for Friday, August 24, 2012. Defendants' counsel contacted Plaintiff's counsel today (August 21, 2012) and asked to postpone this deposition due to an unforeseen scheduling conflict.

3. Because completion of the deposition is necessary for Plaintiff to ascertain whether experts are required and for any experts to prepare their reports, Plaintiff asks for, and Defendants consent to, this requested extension.

4. A grant of additional time to disclose experts will not require a change to the November 16, 2012, deadline for the completion of all discovery; the January 11, 2013, deadline for dispositive motions; or the June 24, 2013, trial setting.

WHEREFORE Plaintiff moves this Court, with the consent of Defendants, for entry of an order modifying the Case Management Order (Doc. # 30) to allow the Plaintiff until September 28, 2012, to disclose experts and provide expert reports and until October 19, 2012, to make experts available for depositions and have depositions completed, and such other relief as is proper under the circumstances.

Respectfully submitted,

/s/ Grant R. Doty

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and a copy was made available electronically to all electronic filing participants.

/s/ Grant R. Doty