# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

AARON TOBEY,

Plaintiff,

v. Case No. 3:11cv154

JANET NAPOLITANO, JOHN S. PISTOLE, CAPITAL REGION AIRPORT COMMISSION, VICTOR WILLIAMS, JOHN SMITH, CALVIN VANN AND JOHN DOES #1 AND #2

## STIPULATION FOR EXTENSION OF TIME TO MOVE FOR JOINDER OF ADDITIONAL PARTY DEFENDANTS

This matter is before the Court on Plaintiff's Motion to Extend Time to Move for Joinder of Additional Party Defendants (Doc # 43) with reference to modification of a provision of the Scheduling Order issued by the Court on July 5, 2011 (Doc #37). Plaintiff and Defendants, by and through their undersigned counsel, hereby stipulate and agree that Plaintiff shall be permitted to move this Court for joinder of additional party defendants in accordance with F.R.C.P. 15(a) up to ten (10) days after his counsel learns the identity of any persons not previously identified by the defendants who may be properly named as a defendant(s), but not later than twenty (20) days prior to the discovery cutoff. The parties further stipulate and agree that any motion to join additional parties made after the ten (10) day limit or later than twenty (20) days prior to the discovery cutoff will be entertained by the Court only upon a showing of good cause.

A proposed Order for the Court's consideration is submitted herewith.

Respectfully submitted,

# /s/ James J. Knicely

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