

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

STEPHEN V. KOLBE, et al.;)	
)	
)	
Plaintiffs,)	Case No.: 1:13-cv-02841-CCB
)	
v.)	
)	
MARTIN J. O'MALLEY, et al.;)	
)	
)	
Defendants.)	

JOINT MOTION TO AMEND THE SCHEDULING ORDER

The parties hereby jointly move the Court to amend its Scheduling Order of October 16, 2013, as previously amended on January 6, 2014, to extend the deadline for completion of discovery. Although the parties have worked diligently to complete discovery, in order to accommodate the schedules of designated expert witnesses and counsel, the parties jointly request that the scheduling order be amended as follows:

1. To extend the deadline for the completion of expert discovery of experts already designated by the parties from January 24, 2014 to February 7, 2014. The parties have already agreed to dates for depositions to be completed within that timeframe;
2. On January 16, 2014, the plaintiffs produced the expert report of Professor Mark Gius. Professor Gius's deposition is scheduled for February 4, 2014. If the

defendants designate a rebuttal expert witness with respect to Professor Gius, the parties request that the defendants' designation and report of such rebuttal expert be allowed to be served on or before February 10, 2014, and any deposition be allowed to be completed by February 28, 2014; and

3. To the extent agreed by the parties, the plaintiffs shall be permitted to resume the deposition of the Maryland State Police's 30(b)(6) designee(s) by February 7, 2014.

Respectfully submitted,

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/s/

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