

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ONEIDA NATION,

Plaintiff,

v.

Case No. 16-CV-1217

VILLAGE OF HOBART, WISCONSIN,

Defendant.

JOINT MOTION TO AMEND DISCOVERY SCHEDULE

By order dated April 19, 2017, the Court allowed discovery in advance of motion(s) for summary judgment to take place and to be completed by August 28, 2017. ECF No. 46. Upon joint motion of the parties, the Court amended the scheduling order to set deadlines for the exchange of expert reports, to close all discovery by March 12, 2018, and to require the filing of dispositive motions within thirty days following the close of discovery. ECF No. 58.

The parties have since complied with all deadlines on the exchange of expert reports and have conducted multiple fact witness depositions. Thus, the parties have made every good faith effort to conclude all discovery by the March 12 deadline. However, because of scheduling issues with the conduct of depositions of expert witnesses and two fact witnesses, the parties are unable to conduct all depositions by the March 12 deadline. By this motion, the parties seek a thirty day extension of the discovery deadline for the limited purpose of conducting outstanding depositions and to extend, accordingly, the deadline for the filing of dispositive motions following the close of discovery, on the terms set out below:

1. The deadline for the close of discovery is extended up to and including April 13, for the limited purpose of conducting depositions of the parties' expert witnesses and Mr. Richard Heidel (requested by Plaintiff Oneida Nation) and Ms. Cristina Danforth (requested by Defendant Village of Hobart).

2. It is the parties' expectation based upon experience thus far in this matter that transcripts of all depositions will be available within two weeks following the conduct of all depositions, or by April 27, at which point the parties can commence preparation of dispositive motions.

3. Accordingly, the deadline for the filing of dispositive motions shall be extended thirty days following the availability of transcripts of depositions on April 27, 2018, or up to and including May 29, 2018.

Respectfully submitted,

Dated this 2nd day of March, 2018.

/s/ Paul R. Jacquart
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