

**IN UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

Susan Doxtator, Arlie Doxtator, and Sarah
Wunderlich, as Special Administrators of
the Estate of Jonathon C. Tubby,

Plaintiffs,

vs.

Erik O'Brien, Andrew Smith, Todd J.
Delain, Heidi Michel, City of Green Bay,
Brown County, Joseph P. Mleziva, Nathan
K. Winisterfer, Thomas Zeigle, Bradley A.
Dernbach, and John Does 1-5,

Defendants,

Case No. 1:19-cv-00137-WCG

**JOINT MOTION TO
EXTEND EXPERT
DISCOVERY DEADLINES**

Plaintiffs and Defendants, by and through their undersigned counsel, hereby jointly and respectfully move this Court to modify the expert discovery deadlines set forth in the Court's Scheduling Order, ECF No. 61.

The parties have diligently pursued fact discovery—serving document requests, interrogatories, and responses thereto. However, the parties are currently exploring options for early resolution, including mediation. Therefore, for the sake of efficiency and to preserve resources, the parties wish to extend expert related deadlines while settlement is explored and/or discussed. Accordingly, the parties request the scheduling order be modified. The parties' proposed modifications are below, and do not affect the close of discovery, dispositive motions, or the trial date:

Case Event	Current Deadline	Proposed Deadline
Plaintiffs' Expert Disclosures	November 22, 2019	January 31, 2020
Defendants' Expert Disclosures	March 1, 2020	May 1, 2020
Plaintiffs' Expert Rebuttal Reports	May 1, 2020	May 22, 2020

Dated: November 6, 2019

By /s/ Forrest Tahdooahnippah

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Dated: November 6, 2019

By /s/ Jasmyne M. Baynard

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Dated: November 6, 2019

By /s/ Benjamin A. Sparks

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ZEIGLE, BRADLEY A DERNBACH***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of November, 2019, I caused to be served the foregoing JOINT MOTION TO EXTEND EXPERT DISCOVERY DEADLINES via ECF on all parties.

/s/ Forrest Tahdooahnippah
Forrest Tahdooahnippah

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[PROPOSED] ORDER
GRANTING JOINT
MOTION TO EXTEND
EXPERT DISCOVERY
DEADLINES

This matter is before the Court on the parties' Joint Motion to Extend Expert Discovery Deadlines. After having considered the motion, the applicable law, and having determined that good cause exists, the Court hereby GRANTS the motion. The deadlines set forth in the Court's scheduling order are hereby amended as follows:

Case Event	Deadline
Plaintiffs' Expert Disclosures	January 31, 2020
Defendants' Expert Disclosures	May 1, 2020
Plaintiffs' Expert Rebuttal Reports	May 22, 2020

IT IS SO ORDERED.

Dated: _____, 2019

Honorable William C. Griesbach
United States District Judge