

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

THE CHRISTIAN MINISTERIAL ALLIANCE,  
PATRICIA BREWER, CAROLYN BRIGGS,  
LYNETTE BROWN, MABLE BYNUM, and  
VELMA SMITH on behalf of themselves and all  
other similarly situated persons,

Plaintiffs,

v.

JOHN THURSTON, in his official capacity as the  
Secretary of State of Arkansas,

Defendant.

Civil Action

Case No. 4:23-cv-00471-DPM-DRS-JM  
(three-judge court)

**JOINT MOTION TO MODIFY LITIGATION SCHEDULE**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 7.2 of the Local Rules of the United States District Court for the Eastern and Western Districts of Arkansas, Plaintiffs The Christian Ministerial Alliance, Patricia Brewer, Carolyn Briggs, Lynette Brown, Mable Bynum, and Velma Smith (“Plaintiffs”) and Defendant John Thurston (“Defendant”) (and, collectively, the “Parties”), by and through their undersigned counsel, respectfully request a slight modification of the Court’s scheduling order entered January 22, 2024 (the “Order”) (ECF No. 41).

As set forth below, the Parties respectfully request that the Court extend certain intermediate deadlines in advance of the December 2, 2024 hearing date for dispositive and *Daubert* motions. The Parties are *not* requesting a change to that hearing date or in any subsequent deadlines in this case. The modifications to the litigation schedule requested by the Parties are as follows:

- i. Fact discovery deadline: July 8, 2024 (current) to August 26, 2024;
- ii. Parties shall identify all expert witnesses and produce their opinions by: July 15, 2024 (current) to September 16, 2024;
- iii. Parties shall identify all rebuttal witnesses and produce their opinions by: July 29, 2024 (current) to September 23, 2024;
- iv. Expert discovery cutoff: August 12, 2024 (current) to September 30, 2024;
- v. Dispositive and *Daubert* motions due: September 12, 2024 (current) to October 14, 2024;
- vi. Joint status report due: September 12, 2024 (current) to October 21, 2024;
- vii. Deposition designations exchanged: October 8, 2024 (current) to November 11, 2024;
- viii. Responses to dispositive and *Daubert* motions due: October 11, 2024 (current) to November 11, 2024;
- ix. Replies in support of dispositive and *Daubert* motions due: November 1, 2024 (current) to November 18, 2024.
- x. All dates and deadlines in the Order, beginning with “Dispositive and *Daubert* motions hearing” on December 2, 2024 and thereafter, would remain as established in the Order.

This is the Parties’ first request for a modification of the schedule set by the Order. Due, in part, to the U.S. Supreme Court’s decision in *Alexander v. South Carolina State Conference of the NAACP*, 144 S.Ct. 1221 (2024), the Parties make this modest request to permit counsel for Plaintiffs and Defendant the required additional time to take necessary depositions, complete fulsome review of documents produced by the Defendant and third parties, and resolve discovery

disputes resulting therefrom (*see, e.g.*, ECF No. 46). No party will be prejudiced by the Parties' requests herein, which are made in good faith and after consultation between the Parties.

For the foregoing reasons, the Parties respectfully request that the Court enter a scheduling order modifying the Order as set forth above.

Dated: July 1, 2024

By: /s/ Chris A. Hollinger

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*/s/ Christine Cryer* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 1, 2024, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

*/s/ Chris A. Hollinger*

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