

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,  
*et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-  
GBL-BMK

**CONSENT MOTION TO MODIFY THE INITIAL PRETRIAL, SCHEDULING AND  
DISCOVERY ORDER**

Plaintiffs, Defendants, and Intervenor-Defendants (collectively, the “Parties”) have conferred and agree that an extension of several Court-ordered discovery deadlines is appropriate in order to allow the Parties to resolve discovery objections as efficiently and effectively as possible. To that end, the Parties request that the Court’s Initial Pretrial, Scheduling and Discovery Order of March 2, 2015, be modified as follows:

1. Any motions to compel arising out of a claim of privilege shall be filed no later than **March 30, 2015**; responses shall be filed on **April 7, 2015**, and replies shall be filed on **April 13, 2015**.
2. If any objections remain unresolved by the Parties on **March 31, 2015**, the Parties shall immediately notify the Court and the Court shall hold a conference call on **April 1, 2015**.

3. The parties agree to rolling production of documents in response to discovery requests beginning on **March 20, 2015**, and ending on a date to be agreed upon by parties upon the determination of the volume of documents to be produced and the resolution of objections.

Pursuant to the Court's ECF Policies and Procedures, a consent order reflecting these proposed modifications will be filed with the clerk's office.

Dated: March 19, 2015

Respectfully submitted,

By: /s/Anthony F. Troy (by JKR with permission)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of March, 2015, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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