

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, et al.,

Defendants.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

ANNIE LOIS GRANT et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, et al.,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE FOR
LIMITED PURPOSE OF TAKING DEPOSITIONS**

The Parties¹ hereby jointly move for entry of an order extending the discovery deadline in the above-captioned cases through and including March 9,

¹ In the interest of judicial economy, the Parties submit this motion and stipulation in each of the two above-captioned cases, reflecting agreement between counsel for all parties in *Pendergrass v. Raffensperger*, No. 1:21-CV-

2023 for the limited purpose of conducting the specific depositions as stipulated herein. In support of this Joint Motion, the Parties respectfully show the Court the following:

1. Discovery in the above-captioned cases is set to expire on February 17, 2023.

2. Good cause supporting this Motion for extension of time exists because the Parties have diligently pursued discovery and mutually agree that a limited extension to the discovery deadline is necessary to take the following depositions as agreed by the parties:

a. The Parties have agreed that the deposition of former Representative Derrick Jackson shall take place on February 20, 2023.

b. The Parties have agreed that the deposition of Dr. Loren Collingwood shall take place on February 21, 2023.

c. The Parties have agreed that the deposition of former Representative Erick Allen shall take place on February 21, 2023.

- d. The Parties have agreed that the deposition of Fenika Miller shall take place on February 21, 2023.
- e. The Parties have agreed that the deposition of Dr. Maxwell Palmer shall take place on February 22, 2023.
- f. The Parties have agreed that the deposition of Dr. John Alford shall take place on February 23, 2023.
- g. The Parties have agreed that the deposition of Marion Warren shall take place on March 2, 2023.
- h. The Parties have agreed that the deposition of Dr. Diane Evans shall take place on March 2, 2023.
- i. The Parties have agreed that the deposition of Blake Evans as a 30(b)(6) representative of the Secretary's office shall take place on March 9, 2023.

3. The present Motion for extension of time is not interposed for any delay or prejudice to any party and the parties have jointly agreed to this schedule to accommodate the professional and personal schedules of the individuals involved.

4. No changes to the deadlines for motions for summary judgment or other dates in the scheduling order is required or requested.

5. Accordingly, the Parties respectfully request that the Court enter an Order extending the discovery deadline through and including March 9, 2023 for the limited purpose of conducting depositions as stipulated herein.
6. A proposed order is attached for the Court's convenience.

This 17th day of February, 2023.

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Dated: February 17, 2023

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing MOTION has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson
Bryan P. Tyson

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**[PROPOSED]
ORDER JOINT MOTION TO EXTEND DISCOVERY DEADLINE FOR
LIMITED PURPOSE OF TAKING DEPOSITIONS**

Having reviewed and considered the parties' Joint Motion to Extend Discovery Deadline for Limited Purpose of Taking Depositions, and for good cause shown, the Court GRANTS the motion. It is hereby ORDERED that the discovery deadline in the above-captioned cases is extended through and

including March 9, 2023 for the limited purpose of conducting depositions as set forth and stipulated in the Motion.

SO ORDERED this ____ day of February, 2023.

STEVE C. JONES
United States District Judge