

For the foregoing reasons, Petteway Plaintiffs respectfully request that this Court grant the parties leave to conduct the depositions of Professor Alford, Mr. Bryan, and Mr. Oldham on a date past the close of discovery on April 21, 2023.

Respectfully submitted this 14th day of April, 2023.

/s/ Valencia Richardson

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CERTIFICATE OF CONFERENCE

I certify that on April 13 and 14, 2023, counsel for Petteway Plaintiffs conferred with counsel for all Parties, who indicated that they consented to this Motion.

CERTIFICATE OF SERVICE

I certify that on April 14, 2023, the foregoing document was filed electronically and served on all parties of record via CM/ECF.

/s/Valencia Richardson
Valencia Richardson

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

TERRY PETTEWAY, THE
HONORABLE DERRECK ROSE,
MICHAEL MONTEZ, SONNY
JAMES and PENNY POPE,

Plaintiffs,

v.

GALVESTON, TEXAS, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-57
[Lead Consolidated Case]

UNITED STATES OF AMERICA,

Plaintiff,

v.

GALVESTON, TEXAS,
GALVESTON COUNTY
COMMISSIONERS COURT, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-93

Dickinson Bay Area Branch NAACP,
GALVESTON BRANCH NAACP,
MAINLAND BRANCH NAACP,
GALVESTON LULAC COUNCIL
151, EDNA COURVILLE, JOE A.
COMPIAN, and LEON PHILLIPS,

Civil Action No. 3:22-cv-117

<i>Plaintiffs,</i>	§
	§
v.	§
	§
GALVESTON, TEXAS,	§
HONORABLE MARK HENRY, in	§
his official capacity as Galveston	§
County Judge, and DWIGHT D.	§
SULLIVAN, in his official capacity as	§
Galveston County Clerk	§
	§
<i>Defendants.</i>	§
	§

[PROPOSED] ORDER GRANTING LEAVE TO TAKE CERTAIN DEPOSITIONS OUT OF TIME

Upon consideration of the Parties’ Consent Motion for Leave to Take Certain Depositions Out of Time and finding it just and appropriate to be granted, the Court GRANTS the Motion.

Accordingly, the Court **ORDERS** that the Parties may conduct the depositions of Dalton Oldham, Thomas Bryan, and John Alford on a date after the close of discovery in this matter on April 21, 2023.

SIGNED this _____ day of _____, 2023.

JEFFREY VINCENT BROWN
UNITED STATES DISTRICT JUDGE