

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

Common Cause Florida, FairDistricts
Now, Florida State Conference of the
National Association for the
Advancement of Colored People
Branches, Cassandra Brown, Peter
Butzin, Charlie Clark, Dorothy Inman-
Johnson, Veatrice Holifield Farrell,
Brenda Holt, Rosemary McCoy, Leo R.
Stoney, Myrna Young, and Nancy
Ratzan,

Plaintiffs,

v.

Cord Byrd, in his official capacity as
Florida Secretary of State,

Defendant.

Case No. 4:22-cv-109-AW-MAF

JOINT EXTENSION MOTION

Plaintiffs Common Cause Florida, FairDistricts Now, Florida State
Conference of the National Association for the Advancement of Colored People
Branches, Cassandra Brown, Peter Butzin, Charlie Clark, Dorothy Inman-Johnson,
Veatrice Holifield Farrell, Brenda Holt, Rosemary McCoy, Leo R. Stoney, Myrna
Young, and Nancy Ratzan (collectively the “Plaintiffs”), and Defendant Cord
Byrd, in his official capacity as Florida Secretary of State, file this joint motion to
extend the deadline for discovery until June 30. In support, the parties state the
following:

1. The discovery deadline for this matter is currently June 9. Doc. 157. The parties have diligently worked together to coordinate the remaining fact and expert depositions around the availability of the witnesses.
2. Based on the current deposition schedule, the parties believe that they will be able to finish discovery by June 30, 2023.
3. The parties believe that this will not impact the scheduled start of trial on the week of September 25, 2023.
4. The parties request this extension of time in good faith and have set forth good cause. This request is also made before the current prescribed deadline expires.

WHEREFORE, the parties jointly and respectfully request that the Court extend the deadline to complete discovery to June 30, 2023.

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LOCAL RULE CERTIFICATIONS

I certify that the parties have conferred and thus complied with the attorney-conference requirement of Local Rule 7.1(B). This is a joint motion.

This motion contains 206 words and complies with the word-count requirement of Local Rule 7.1(F).

/s/ Mohammad O. Jazil
Mohammad O. Jazil

CERTIFICATE OF SERVICE

I certify that on June 9, 2023, the foregoing was filed through the Court's CM/ECF, which will serve a copy to all counsel of record.

/s/ Mohammad O. Jazil
Mohammad O. Jazil