

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

BALTIMORE COUNTY BRANCH OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
et al.,

Plaintiffs,

v.

BALTIMORE COUNTY, MARYLAND,
et al.,

Defendants.

Civil Action No. 1:21-cv-03232-LKG

CONSENT MOTION TO EXTEND DEADLINES IN SCHEDULING ORDER

Defendant Baltimore County, Maryland (“Baltimore County”), by and through undersigned counsel, and with the consent of counsel for Plaintiffs Baltimore County Branch of the National Association for the Advancement of Colored People, League of Women Voters of Baltimore County, Common Cause of Maryland, Charles Sydnor, Anthony Fugett, Dana Vickers Shelley, Danita Tolson, Sharon Blake, Gerald Morrison, and Niesha McCoy (“Plaintiffs”), hereby respectfully moves this Court to extend the deadlines in the scheduling order, and in support states:

1. On February 5, 2024, Plaintiffs filed their Memorandum in support of their Motion for Attorneys’ Fees and Litigation Expenses, attaching the declarations of Cyril Smith and Mitchell Mirviss in support. ECF 105.
2. On February 26, 2024, Baltimore County filed its Response in Opposition to Plaintiffs’ Motion for Attorneys’ Fees and Litigation Expenses, ECF 106, and a pre-motion letter to the Court requesting a conference regarding Plaintiffs’ Motion for Attorneys’ Fees and Litigation Expenses and the supporting declarations. ECF 107.

3. On March 12, 2024, the Court held a telephonic court conference with the parties, after which the Court amended the scheduling order to allow Baltimore County to file responsive declarations by April 4, 2024, and moved Plaintiffs' deadline for their Reply in support of Motion for Attorneys' Fees and Litigation Expenses to April 19, 2024. ECF 110.

4. Counsel for Baltimore County seeks a brief extension of time up to and including April 11, 2024, to file declarations in order to accommodate their respective schedules.

5. Counsel for Baltimore County conferred with counsel for Plaintiffs about this request, and Plaintiffs' counsel consented to the extension. All parties agree that Plaintiffs' deadline to file their reply brief shall be extended by a commensurate amount of time, up to and including April 26, 2024.

6. This motion is made in good faith and not for any improper purpose.

7. This extension will not prejudice either party and will serve the interest of judicial economy.

WHEREFORE, Defendant Baltimore County, Maryland respectfully requests an extension of the Scheduling Order.

Dated: April 4, 2024

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Respectfully submitted,

/s/ Melissa O. Martinez

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*Counsel for Defendant
Baltimore County, Maryland*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 4, 2024, a copy of the foregoing Consent Motion to Extend Deadlines in Scheduling Order and Proposed Order was filed and served via CM/ECF, on all counsel of record.

/s/ *Melissa O. Martinez*

Melissa O. Martinez

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[PROPOSED] ORDER

UPON CONSIDERATION of the Consent Motion to Extend Deadlines in Scheduling Order (the “Consent Motion”) filed by Defendant Baltimore County, Maryland (“Baltimore County”), there being no opposition thereto, and for good cause having been shown, it is this _____ day of _____, 2024, hereby:

ORDERED, that the Consent Motion is **GRANTED**; and it is further

ORDERED, that the Amended Scheduling Order, ECF 110, is further amended as follows:

Event	Current Deadline	Modified Deadline
Defendant Baltimore County’s Declarations	April 4, 2024	April 11, 2024
Plaintiffs’ reply in support of their motion for attorneys’ fees and litigation expenses.	April 19, 2024	April 26, 2024

HON. LYDIA KAY GRIGGSBY
United States District Judge