IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE CONFERENCE OF THE NAACP, *et al.*,

Plaintiffs,

v.

THOMAS C. ALEXANDER, *et al.*,

Defendants.

Case No. 3:21-cv-03302-JMC

JOINT CONSENT MOTION FOR AN EXTENSION OF EXPERT DEADLINES FOR EXPERT DISCLOSURES IN THE COURT'S SCHEDULING ORDER

Pursuant to Local Civil Rule 6.01 (D.S.C.), Thomas C. Alexander, in his official capacity as President of the Senate, and Luke A. Rankin, in his official capacity as Chairman of the Senate Judiciary Committee, (collectively, the "Senate Defendants"), together with Plaintiffs The South Carolina State Conference of the NAACP and Taiwan Scott, jointly move for a one-week extension of the parties' deadlines for expert designations and disclosures in the challenge to the U.S. Congressional maps. *See* ECF No. 180, at ¶¶ 4–5 & n.1.

Because the parties are busy preparing for trial on Plaintiffs' challenge to the House plan, as well as drafting briefs and exchanging discovery on the Congressional plan, they require additional time to prepare their respective expert disclosures and reports. The current deadline for Plaintiffs to submit their expert disclosures and reports is April 4, 2022 (today). Defendants' deadline for expert disclosures and reports is April 11, 2022, and the parties' rebuttal disclosures and reports are due April 25, 2022. A one-week extension would make the new deadlines as follows: April 11, 2022 for Plaintiffs' expert disclosures and reports; April 18, 2022 for Defendants' expert disclosures and reports; and May 2, 2022 for the parties' rebuttal expert disclosures and reports. The parties have not previously requested an extension of these deadlines.

Further, the modest requested extensions will not affect any other deadlines in the Court's Second Amended Conference and Scheduling Order. *See* ECF No. 180, at ¶¶ 6–12.

Accordingly, for good cause shown, the parties respectfully request that the Court grant this joint consent motion to extend the expert designation deadlines by one week. The House Defendants and Election Commission Defendants likewise consent to this motion. *See* Local Civil Rule 7.02 (D.S.C.).

April 4, 2022

Respectfully submitted,

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* Motion for admission *Pro Hac Vice* forthcoming
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