

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Randy Squires, et al.	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Robert Atcheson, et al.	)	Civil Action No.: 1:05-cv-01120 (JR)
	)	Judge James Robertson
Defendants.	)	
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	)	
	)	
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**JOINT MOTION FOR MODIFICATION OF SCHEDULING ORDER**

COMES NOW Plaintiff, Randy Squires, et al., and Defendant District of Columbia (“District”), by and through undersigned counsel, and respectfully move this Court for an Order modifying the Scheduling Order to (1) provide additional time for the parties to complete discovery in this case, and (2) provide additional time for the parties to prepare for trial.

Pursuant to Local Civil Rule 7(m), counsel for Plaintiff and counsel for Defendant conferred and are filing the instant motion jointly. In support of this motion, Plaintiffs and Defendant District state as follows:

1. Lead counsel for Plaintiffs experienced a serious medical surgery in August, which required 6-8 weeks of recovery. Plaintiffs’ counsel’s recovery lasted well into the month of September, wherein he only was able to work on a part-time basis. Further, during this time there has been an ongoing administrative appeal, which is relevant to the instant case. And most important, both counsels have been unable to complete discovery prior to the November 14, 2006 deadline. In short, Plaintiffs’ counsel’s original expectation of being able to complete oral and written discovery on or before November 14, 2006, was overly-ambitious given the number of plaintiffs (there are seven) in the instant matter.

2. Defendant's counsel's schedule has been relatively demanding with regard to other litigation matters, thereby justifying his similar need for modification of the scheduling order.

3. Despite Plaintiffs' counsel's medical setback, the parties have made diligent efforts to exchange written discovery, and schedule depositions, pending the Court's ruling on the instant motion.

4. For each of the foregoing reasons, the parties respectfully move this Court to modify the scheduling order in this case as follows, and to schedule trial in the immediate case in March 2007:

January 30, 2007: Close of discovery;

March 6, 2007: Pretrial date;

March 27, 2007: Trial date

Respectfully submitted,

/s/  
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