

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

ASSOCIATION OF COMMUNITY)
ORGANIZATIONS FOR REFORM NOW, et al.,)
)
Plaintiffs,)
)
v.) Case No. 08-04084-CV-NKL
)
DEBORAH E. SCOTT, et al.,)
)
Defendants.)

**CONSENT MOTION FOR AN EXTENSION OF TIME
TO COMPLETE FACT DISCOVERY**

Plaintiffs, by and through their undersigned counsel, respectfully request that the Court grant an extension of time for (i) the deadline to submit discovery motions and (ii) the deadline for the close of fact discovery. In support of this Consent Motion, Plaintiffs state as follows:

1. The Court entered a Scheduling and Bench Trial Order (the "Scheduling Order") on July 31, 2008.
2. Pursuant to Paragraph C.1 of the Scheduling Order, all discovery motions are to be filed on or before January 15, 2009.
3. Pursuant to Paragraph C.3 of the Scheduling Order, all fact discovery is to be completed by January 30, 2009.
4. Plaintiffs respectfully request that the Scheduling Order be amended such that:
 - (i) All discovery motions will be filed on or before February 28, 2009.
 - (ii) All fact discovery will be completed by March 15, 2009.

5. All other deadlines in the Scheduling Order, including the March 27, 2009 deadline for the completion of expert discovery, will remain unchanged.

6. Neither party has sought a previous extension for these or any other deadlines in the Scheduling Order.

7. Plaintiff seeks these extensions in order to facilitate settlement discussions between the parties. The parties have been engaged in settlement negotiations, including the exchange of proposed settlement agreements and request the aforementioned extensions in order to allocate sufficient time for discovery in the event these discussions do not result in the resolution of this action.

8. Counsel for Plaintiffs has conferred with counsel for the Defendants and the Defendants have consented to the requested extensions.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiff's Consent Motion for an Extension of Time to Complete Fact Discovery and amend the Scheduling Order such that (i) all discovery motions will be filed on or before February 28, 2009 and (ii) all fact discovery will be completed by March 15, 2009.

Dated: January 15, 2009

Respectfully submitted,

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