

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

CELIA VALDEZ, *et al.*,

Plaintiffs,

v.

MARY HERRERA, *et al.*,

Defendants.

CIVIL ACTION NO. 1:09-cv-668 LH/DJS

JOINT STIPULATED MOTION TO EXTEND THE DISCOVERY DEADLINES

Pursuant to the Federal Rules of Civil Procedure Rule 16(b)(4), the September 21, 2009 Scheduling Order [Docket No. 23], for good cause, and in the interests of judicial efficiency, the parties hereby jointly stipulate and agree that the discovery deadlines set forth in the Scheduling Order be extended for an additional sixty (60) days to permit the parties a full and fair opportunity to continue settlement discussions in an effort to conclude this matter. Accordingly, the parties stipulate and agree to the following discovery extensions:

- Termination date for discovery: Extended from April 1, 2010 to June 1, 2010;
- Deadline for filing discovery motions: Extended from April 12, 2010 to June 11, 2010;
- Deadline for Plaintiffs to make expert disclosures and file expert reports: Extended from March 5, 2010 to May 7, 2010;

- Deadline for all other parties to make expert disclosures and file expert reports: Extended from March 30, 2010 to May 28, 2010; and,
- Deadline for filing pretrial motions, other than discovery motions: Extended from June 1, 2010 to July 30, 2010.

No other deadlines set forth in the Scheduling Order are to be extended.

This is the parties' first request for an extension of time in this matter.

Respectfully submitted this 10th day of February, 2010.

/s/

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