

**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 EXPERT DISCOVERY
DEADLINES**

Pursuant to the Federal Rules of Civil Procedure Rule 16(b)(4), the parties jointly stipulate that the discovery deadlines set forth in the Order Extending Discovery Deadlines, dated February 12, 2010 (Doc. 39), be extended for good cause and in the interests of judicial efficiency to permit the parties a full and fair opportunity to continue settlement discussions in an effort to conclude this matter, and to permit the parties to substantially complete factual discovery before submitting expert reports. Accordingly, the parties stipulate to the following discovery extensions:

- Deadline for Plaintiffs to make expert disclosures and file expert reports: extended from May 7, 2010, to June 15, 2010;
- Deadline for all other parties to make expert disclosures and file expert reports: extended from May 28, 2010, to July 6, 2010;
- Termination date for expert discovery: extended from June 1, 2010, to July 23, 2010;
- Deadline for filing expert discovery motions: extended from June 11, 2010, to August 6, 2010; and

- Deadline for filing pretrial motions, other than discovery motions: extended from July 30, 2010, to August 13, 2010.

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

Respectfully submitted this 7th day of May, 2010.

For Plaintiffs:

s/ Mark A. Posner

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