

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE
CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

v.

PATRICK LLOYD MCCRORY, in his
official capacity as the Governor of North
Carolina, et al.,

Defendants.

**JOINT MOTION TO AMEND
EXPERT DISCLOSURE
DEADLINES**

Civil Action No. 1:13-CV-658

LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et
al.,

Defendants.

Civil Action No. 1:13-CV-660

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF NORTH CAROLINA, *et*
al.,

Defendants.

Civil Action No. 13-cv-861

JOINT MOTION TO AMEND EXPERT DISCLOSURE DEADLINES

Pursuant to Fed. R. Civ. P. 29(b), the parties hereby inform the Court that they have reached an agreement to modify slightly the due dates for service of expert reports and disclosures in the three related cases, *North Carolina State Conference of the NAACP v. McCrory*, 1:13-cv-658 (M.D.N.C.); *League of Women Voters v. North Carolina*, 1:13-cv-660 (M.D.N.C.); and *United States v. North Carolina*, 1:13-cv-861 (M.D.N.C.), and move to amend the expert disclosure deadlines set out in this Court's December 5, 2014 Order. *See* ECF No. 203, 13-cv-861. The agreement to modify the expert disclosure deadlines does not affect the close of discovery or the deadlines for dispositive motions as established in the December 5 Order.

The parties jointly agree to modify these dates in light of the on-going Rule 30(b)(6) deposition of the state Department of Transportation, which will be continued on Friday, February 6, to accommodate witnesses' availability. As a result, the parties agreed to the following:

1. The Expert Reports and Disclosures under Rule 26(a)(2)(B) and 26(a)(2)(C) currently due on February 9 will now be due on February 12, 2015;
2. The Rebuttal Expert Reports currently due on March 9 will now be due on March 12, 2015; and
3. The Sur-rebuttal expert reports currently due on March 16 will now be due on March 19, 2015.

The close of discovery would remain on March 23, 2015, and no other discovery deadlines would be affected by this joint agreement.

Dated: February 3, 2015

Respectfully submitted,

By: /s/ Adam Stein

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CERTIFICATE OF SERVICE OF DISCOVERY

I hereby certify that on February 3, 2015, I electronically filed the foregoing **Joint Motion to Amend Expert Disclosure Deadlines**, using the CM/ECF system in case numbers 1:13- cv-658, 1:13- cv-660, and 1:13-cv-861, which will send notification of such filing to all counsel of record.

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