

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI CIVIL DIVISION**

Case No. 1:12-cv-22282-WJZ
Honorable Judge William J. Zloch

KARLA VANESSA ARCIA, an individual,
MELANDE ANTOINE, an individual, VEYE
YO, a civic organization based in Miami-
Dade County, FLORIDA IMMIGRANT
COALITION, INC., a Florida non-profit
corporation, NATIONAL CONGRESS FOR
PUERTO RICAN RIGHTS, a Pennsylvania
non-profit corporation, FLORIDA NEW
MAJORITY, INC., a Florida non-profit
corporation, and 1199SEIU UNITED
HEALTHCARE WORKERS EAST, a Labor
Union,

Plaintiffs,

v.

KEN DETZNER, in his official capacity as
Florida Secretary of State,

Defendant.

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiffs and Defendant hereby jointly request a short extension of the deadlines set forth in the Court's Order for Pre-Trial Conference (DE 36) and Order of August 24, 2012, (DE 46), including the parties' deadlines to amend the pleadings, exchange expert reports, file motions for summary judgment, and for the close of discovery. The parties are diligently working together to significantly narrow the issues in this case and expect to have done that by early next week. These actions will alter the need for discovery, as well as the type of amended complaint plaintiffs expect to file. At present, depositions are scheduled throughout next week because of the discovery deadlines. A short extension of the deadlines may obviate the need for any

depositions and to concentrate on reaching a settlement. The parties therefore request that the Court amend the schedule in this case as follows:

1. The deadline for filing an Amended Complaint is extended to Wednesday, September 12, 2012;
2. All Motions for Summary Judgment and Motions for Judgment on the Pleadings must be filed no later than Wednesday, September 19, 2012;
3. Resumes of experts and their reports must be exchanged no later than September 19, 2012; and
4. All Discovery must be completed no later than September 20, 2012.

In the interest of furthering the parties' discussions, Plaintiffs have also agreed not take the depositions previously scheduled for Monday, September 10, and Tuesday, September 11, 2012, and Defendant has also agreed not to later oppose these depositions on the basis of inadequate time during the remaining discovery period (however Defendant reserves the right to oppose these depositions on other grounds).

Dated: September 7, 2012

Respectfully submitted,

For the Plaintiffs:

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KEN DETZNER, in his official capacity as
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Defendant.

[PROPOSED] ORDER GRANTING CONSENT MOTION FOR EXTENTION OF TIME

THIS MATTER is before the Court upon the parties' Consent Motion For Extension of Time. Having reviewed the motion, it is **ORDERED AND ADJUDGED** that:

1. The deadline for filing an Amended Complaint is extended to Wednesday, September 12, 2012;
2. All Motions for Summary Judgment and Motions for Judgment on the Pleadings must be filed no later than Wednesday, September 19, 2012;
3. Resumes of experts and their reports must be exchanged no later than September 19, 2012; and

4. All Discovery must be completed no later than September 20, 2012.

DONE AND ORDERED at Fort Lauderdale, Broward County, Florida, this _____
day of _____, 2012.

Honorable William J. Zloch, U.S.D.J.