

Multiple Documents

Part	Description
1	7 pages
2	Text of Proposed Order

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 TAKE
DEPOSITION OUT OF TIME**

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. 1:13-cv-861

JOINT MOTION TO TAKE DEPOSITION OUT OF TIME

On June 9, 2015, this Court in the three above-captioned cases ordered that it would “extend the deadline for depositions to June 12, 2015 for the limited purpose of completing the depositions contemplated in the instant Motion . . . should the parties need additional time beyond June 12, 2015, they must file an appropriate Motion with the Court.” *See* ECF No. 274, p. 2.¹ The Court also stated that it did not contemplate allowing extensions beyond June 18, 2015, absent extraordinary circumstances. *See* ECF No. 252, p. 2 n. 1.

The parties hereby jointly move the Court to extend the June 12 deadline for the deposition of Erika Churchill. Ms. Churchill has been identified by Defendants as a witness under Federal Rules of Civil Procedure 26(a)(1) and 26(e). Plaintiffs have previously sought to depose Ms. Churchill, but were informed by Defendants that her work on matters relevant to this case was on-going. This work was completed in the form of an affidavit transmitted to the Plaintiffs by Defendants on June 4, 2015. The parties have scheduled Ms. Churchill’s deposition for June 18, 2015.

Thus, the parties jointly ask the Court to grant this motion.

Dated: June 15, 2015

Respectfully submitted,

By: /s/ Adam Stein

¹ All ECF references in this filing refer to 1:13-cv-861.

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CERTIFICATE OF SERVICE OF DISCOVERY

I hereby certify that on June 15, 2015, I electronically filed the foregoing **Joint Motion to Set Trial Date and to Schedule Pre-Trial Telephonic Conference Call**, 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.

/s/ Spencer R. Fisher

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**[PROPOSED] ORDER
GRANTING JOINT MOTION TO
TAKE DEPOSITION OUT OF
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Civil Action No. 13-cv-861

**[PROPOSED] ORDER GRANTING JOINT MOTION
TO TAKE DEPOSITION OUT OF TIME**

This matter is before this Court on a Joint Motion of the parties to take a deposition out of time. The Court finds good cause to grant the motion as follows:

1. The deposition of Ms. Erika Churchill may be taken after the current deadline for fact witness depositions and shall be concluded by June 18, 2015.

IT IS THEREFORE ORDERED that the parties' Joint Motion is GRANTED, as set out above.

This ____ day of June, 2015.

United States District Court Judge

General Information

Court	United States District Court for the Middle District of North Carolina; United States District Court for the Middle District of North Carolina
Federal Nature of Suit	Civil Rights - Voting[441]
Docket Number	1:13-cv-00660