

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JANNIE LIGONS, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
vs.)	Case Nos.: CIV-16-19-HE
)	CIV-16-184-HE
CITY OF OKLAHOMA CITY,)	CIV-16-349-HE
a municipal corporation, <i>et al.</i> ,)	CIV-16-412-HE
)	
<i>Defendants.</i>)	

MOTION TO EXTEND DISCOVERY DEADLINE

Defendant Daniel Holtzclaw, through the undersigned counsel, moves this Court for an Order extending the current discovery deadline to include a new discovery deadline of October 1, 2021. In support thereof, the Court is shown the following:

1. The Scheduling Order (Doc. 155) currently has September 1, 2021, as the deadline to complete discovery.
2. Holtzclaw has filed contemporaneously with this Motion a Motion to Compel Discovery. He seeks an additional 30 days to tie up the final loose ends concerning discovery and for the Court to resolve the dispute among the parties on the last remaining items of discovery requested by Holtzclaw.

3. The Court is reminded that counsel came into this litigation late in the process, and as outlined in the Motion to Compel, the record in this case consists of the voluminous pleadings in the four civil cases filed in this Court, the thousands of pages of depositions, the thousands of pages of trial transcripts and pleadings from the state criminal trial, and a thousands-of-pages data dump produced to Holtzclaw by the City in electronic form, including over 8,000 e-mails, which we are reviewing now.
4. In addition, Counsel has had three eye-surgery procedures since early July, 2021, for a detached retina (two laser procedures and a “buckle” surgery), the latest of which was the most severe on August 13, 2021, which has hampered his ability to move the discovery process along over the past two months, but most of it has been processed and analyzed.
5. Despite this difficulty and the state of the record, there is a modest amount of discovery material still at issue, almost all of which is in the physical custody of the City or involve records of the Plaintiffs that are easily accessible and do not involve any material intrusion upon parties unrelated to this litigation.
6. Holtzclaw seeks a 30-day extension of the discovery deadline only. Trial is still four months away and Holtzclaw sees no disruption in any of the other various deadlines, including motions for summary judgment, in the event that

the discovery process is given another 30-days to get these last remaining issues resolved by the Court.

7. Counsel for the City of Oklahoma City, object to this motion.
8. Counsel for Plaintiffs Ellis and Raines does object to this motion.
9. The undersigned has not been able to obtain a position from counsel in CIV-2016-349-HE (Plaintiff Adaira Gardner) or from counsel for the other named Plaintiffs.

The relief requested by this motion will not impact previously set deadlines, including the trial docket for December, 2021.

WHEREFORE, good cause having been shown, Defendant Holtzclaw moves for an Order extending the discovery deadline only for 30 days, or until October 1, 2021.

Respectfully submitted,

s/ James L. Hankins

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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2021, I filed the foregoing document with the Clerk of this Court and that, based upon the records on file in this case, the Clerk of Court will transmit Notice of Electronic Filing to those registered participants of the Electronic Filing System.

s/ James L. Hankins