

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

TABATHA BARNES, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CIV-16-184-HE
	)	
CITY OF OKLAHOMA CITY,	)	
a municipal corporation, <i>et al.</i> ,	)	
	)	
Defendants.	)	

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SHERRY ELLIS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CIV-16-019-HE
	)	
DANIEL HOLTZCLAW, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**PLAINTIFFS’ RESPONSE IN OPPOSITION TO DEFENDANT HOLTZCLAW’S  
MOTION TO EXTEND DISCOVERY DEADLINE**

Plaintiffs Shardayreon Hill, Carla Johnson, Jannie Ligons, Kala Lyles, and Terri Morris in CIV-16-184-HE, and Plaintiff Regina Copeland in CIV-16-019-HE (collectively “Plaintiffs”) hereby submit their Response to Defendant Holtzclaw’s Motion to Extend Discovery Deadline. Plaintiffs object to the requested extension, and, in support of their objection, advise the Court as follows:

1. This action has been pending for more than five (5) years.
2. To Plaintiffs’ knowledge, throughout the entire course of this litigation, which has included approximately sixteen (16) extensions of the deadlines in the

scheduling order, *Holtzclaw has never served these Plaintiffs with any written discovery requests.*

3. Holtzclaw should not be permitted to begin conducting written discovery *for the first time* (at least with respect to these Plaintiffs) at this eleventh hour.

WHEREFORE, Plaintiffs respectfully ask that the Court deny Holtzclaw's motion.

Respectfully submitted,

**SOLOMON SIMMONS LAW, P.L.L.C**

*/s/KyMBERli J. M. Heckenkemper*

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