UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff v. CHARLES E. SMITH, LLC, *et al.*, Defendants	**Case No. 1:16-CV-03759-ELH**

JOINT MOTION TO EXTEND SCHEDULING ORDER

All parties, by and through their respective undersigned counsel, hereby submit this Joint Motion to Enlarge the Scheduling Order and for cause state as follows:

1. On May 20, 2019, this Court approved a modification of the Scheduling Order in light of the Bureau's Motion for Leave to File a Second Amended Complaint (ECF 105). Per the Court's Order, the following are the applicable deadlines, in pertinent part:

> All defendants' responses to the Bureau's Requests for Admission are due 30 days after the Court's decision on the Bureau's motions regarding the proposed second amended complaint.
>
> If the Court denies the Bureau's motions, motions for summary judgment shall be as follows:
>
> a. The Bureau's motion for summary judgment is due 30 days after the denial.
>
> b. Defendants' cross-motions for summary judgment and oppositions to the Bureau's motions are due 21 days later.
>
> c. The Bureau's opposition to the cross-motions and reply are due 21 days after the Defendants' cross-motions and oppositions.

d. Defendants' replies are due 21 days after the Bureau's opposition.

2. On November 26, 2019, this Court denied the Bureau's Motion for Leave to file a Second Amended Complaint, thereby triggering the above deadlines. See ECF 118 and 119. Thus, under the current Scheduling Order, Defendants' responses to the Bureau's Request for Admissions and the Bureau's Motion for Summary Judgment are both due on December 26, 2019.

3. Given the Christmas and New Year's Holidays, subject to this Court's approval, the parties have agreed to extend the deadlines 15 days for Defendants to Respond to the Bureau's Request for Admissions and for the Bureau to file its Motion for Summary Judgment, such that those filings would be due on or before Friday, January 10, 2020.

4. Thus, if this Court approves the parties requested enlargement of the Scheduling Order, the following would be the applicable deadlines:

Defendants' Responses to Bureau's Request for Admissions	January 10, 2020
Bureau's Motion for Summary Judgment	January 10, 2020
Defendants' Cross-Motions for Summary Judgment/Oppositions to Bureau's Motions	January 31, 2020
Bureau's Opposition to the Cross-Motions and Reply	February 21, 2020
Defendants' Replies to the Bureau's Opposition	March 13, 2020

5. In making this Joint Motion to Extend Scheduling Order, Defendants do not waive their Joint Motion for A Stay of Proceedings (ECF No. 113), and the Bureau does not waive its opposition to the Defendants' Joint Motion for a Stay of Proceedings.

WHEREFORE, the parties respectfully request that this Honorable Court modify the Scheduling Order as requested in the instant Motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of December, 2019, copies of the foregoing Joint Motion to Extend Scheduling Order were served upon on counsel of record via the Court's electronic filing system:

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