

4. Meech has retained another expert to review the issues in this matter and render expert opinions.

5. Her new expert requires approximately sixty days to review the issues, perform any necessary research, visit the site, and prepare a report.

6. Existing deadlines that need to be extended are as follows:

EVENT	REQUESTED NEW DEADLINE
Expert disclosures of newly retained expert:	November 9, 2020
Expert disclosures of any rebuttal Reports:	December 9, 2020
End of Discovery:	February 15, 2020
Motions Related to Discovery:	February 28, 2020
Pretrial motions other than Discovery motions (including Motions which may require a Daubert hearing) filed by:	March 15, 2021
Pretrial Order from Plaintiff to Defendant by:	May 31, 2021
Pretrial Order to Court by:	June 15, 2021

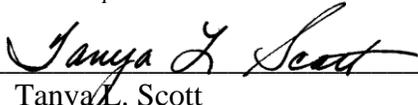
7. Meech further requests that the Settlement Mediation set before the United States Magistrate on November 3, 2020 be vacated and rescheduled at a later date.

8. Plaintiffs in this matter have no objection to the requested extension of deadlines.

WHEREFORE, for the reasons stated above, Meech respectfully requests that the Court enter an Order extending the remaining deadlines set in the Court's Order Setting Case Management Deadlines and Discovery Parameters [ECF 3455] by sixty days.

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,
A Professional Corporation

By: 
Tanya L. Scott
Attorneys at Law
Albuquerque Plaza, 201 3rd Street NW, Ste. 1750
Albuquerque, NM 87102
(505) 346-0998 / FAX: (505) 346-0997

CERTIFICATE OF SERVICE

The undersigned certifies that on September 11, 2020 I filed the foregoing *Motion to Extend Deadlines* electronically through the CM/ECF system, which caused CM/ECF Participants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.


Tanya L. Scott