

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

SEMINOLE TRIBE OF FLORIDA,

Plaintiff,

v.

CONSOLIDATED CASE
CASE NO.: 4:15-cv-516-RH/CAS

STATE OF FLORIDA,

Defendant.

_____ /

**JOINT MOTION FOR EXTENSION OF
CASE MANAGEMENT DEADLINES**

The Plaintiff SEMINOLE TRIBE OF FLORIDA (the “**Tribe**”) and the Defendant STATE OF FLORIDA (the “**State**”) jointly move for an order extending the case management deadlines as set forth below and state as follows:

1. On November 11, 2015, this Court entered an Initial Scheduling Order (Dkt. 7) that established certain deadlines, subject to modification following the parties’ Rule 26 conference.

2. Following the Rule 26 conference, the parties submitted their Joint Report (Dkt. 14), proposing limited modifications to the Court’s Initial Scheduling Order. In the Joint Report, the parties agreed to endeavor to complete discovery in this case by March 9, 2016 and did not propose any modification to that deadline.

3. Following the submission of the Joint Report, on January 12, 2016, this Court entered its Scheduling and Mediation Order (Dkt. 17). The Scheduling and Mediation Order established that the discovery deadline would be March 9, 2016 and the case shall be ready for trial by July 2016.

4. Since the entry of the Scheduling and Mediation Order, the parties have engaged in substantial discovery, including significant written discovery and the scheduling of depositions.

5. During such discovery, the parties have worked cooperatively to resolve several issues relating to discovery objections and confidentiality concerns and the large volume of documents. Such issues slowed the progress of the parties' document productions, which caused a delay in setting several depositions.

6. The scheduling of depositions was further complicated because several of the witnesses and attorneys involved in the case had other professional obligations and scheduling conflicts.

7. As such, the Tribe still needs to take the depositions of a corporate representative of the State and the depositions of two State officials, Leon Biegalski and Jonathan Zachem. Similarly, the State needs to take the depositions of Tribe employees James Allen, Jim Shore, Juan Martinez, and Gordon Dickie, and third party witnesses Edward Jenkins, Gaming Laboratories International, Deloitte, LLP, Todd Handzo, Michael Mignone, and Melissa Lawres. Also, both

parties have yet to complete their respective review of the voluminous documents produced and both parties anticipate the possible need to depose additional fact witnesses and each others' expert witnesses.

8. The parties are also actively conferring to resolve certain discovery issues in order to avoid the need to file any motions to compel, and the parties need more time to confirm that such discovery issues are resolved.

9. As such, despite an ongoing, diligent, and cooperative effort, the parties have determined that the necessary discovery cannot be completed by the March 9, 2016 deadline.

10. The parties jointly request a sixty (60) day enlargement of the discovery deadline and an extension of all other dates as set forth below:

Event	Current Deadline	Proposed Deadline
Discovery Deadline (including related motions to compel)	March 9, 2016	May 13, 2016
Plaintiff's Expert Disclosure	March 1, 2016	May 6, 2016
Defendant's Expert Disclosure	April 1, 2016	June 6, 2016
Rebuttal Expert Disclosure	April 15, 2016	June 17, 2016
Summary Judgment Motions	21 days after March 9, 2016	21 days after May 13, 2016
Rule 26 Supplementation	May 2, 2016	July 1, 2016
Two-Week Trial Period	July 5, 2016	October 3, 2016

11. This request is not being made for the purposes of delay but, instead, to allow counsel ample opportunity to complete discovery and prepare for trial.

LOCAL RULE 7.1(B) CERTIFICATION

All parties have conferred and jointly request the relief in this motion.

WHEREFORE, the parties request entry of an order extending the case management deadlines as outlined above.

Respectfully submitted,

Dated: March 9, 2016

Counsel for Plaintiff

/s Barry Richard

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 9, 2016, the foregoing was filed electronically with the Clerk of the United States District Court for the Northern District of Florida by using CM/ECF system which will send a notice of electronic filing to the parties.

/s/ Barry Richard
Attorney