

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>JOSEPH SAAD, INDIVIDUALLY, ZIHRA SAAD, INDIVIDUALLY,</p> <p>PLAINTIFFS,</p> <p>- Vs -</p> <p>CITY OF DEARBORN HEIGHTS, ET AL.,</p> <p>DEFENDANTS.</p>	<p>CIVIL CASE No. 2:11-cv-10103</p> <p>STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES</p> <p>- HONORABLE PATRICK J. DUGGAN -</p> <p>- MAGISTRATE JUDGE MARK A. RANDON -</p>
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UNITED STATES DISTRICT COURTS:

- DISTRICT OF ARIZONA

- EASTERN DISTRICT OF MICHIGAN

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STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

The parties, by counsel, hereby stipulate as follows:

1. WHEREAS, the Court entered a Scheduling Order dated May 10, 2011 (“Scheduling Order”) establishing discovery and motion deadlines.

2. WHEREAS Plaintiffs filed a Motion for a Protective Order regarding Defendants’ depositions (“Plaintiffs’ Motion”).

3. WHEREAS the Court scheduled a hearing on Plaintiffs’ Motion for November 3, 2011.

4. WHEREAS the discovery deadline stated in the Scheduling Order is October 15, 2011 and the Motion cut-off date is November 1, 2011.

5. WHEREAS the parties, despite their diligent efforts, have not completed discovery and are unable to complete discovery on or before October 15, 2011.

6. WHEREAS the parties desire to extend the discovery deadline to December 16, 2011 and the motion cut-off date to January 3, 2011.

7. WHEREAS the foregoing extensions will not affect the Pretrial Conference scheduled for January 11, 2011

8. WHEREAS the foregoing extensions will not affect/delay the expected January/February 2012 trial date.

NOW THEREFORE, it is hereby stipulated that discovery be extended to December 16, 2011 and the motion cut-off date be extended to January 3, 2012.

IT IS SO ORDERED.

DATED: _____

HONORABLE PATRICK J. DUGGAN
UNITED STATES DISTRICT JUDGE,
EASTERN DISTRICT OF MICHIGAN

APPROVED AS TO SUBSTANCE AND FORM THIS 9TH DAY OF OCTOBER 2011.

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CUMMINGS, McCLOREY, DAVIS, & ACHO PLC

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CERTIFICATE OF SERVICE

I hereby certify that on October 09, 2011, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notice of such filing to all attorneys of record in this matter. Since none of the attorneys of record are non-ECF participants, hard copies of the foregoing have not been provided via personal delivery or by postal mail.

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/s/NEMER N. HADOUS

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