IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Bourke	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. 20-cv-4427
	)	
United States of America,	)	*(Magistrate Judge Valdez)*
	)	
Defendants.	)	

AGREED MOTION TO EXTEND DISCOVERY

Plaintiff, with the agreement of defendant United States, moves the Court to extend from October 14, 2023 to February 5, 2024 the time in which the parties may complete discovery in this case.

Grounds for this motion are as follows:

1.   This case is before the Court on remand from the Court of Appeals, *Bourke v. United States*, 25 F.4th 486 (7th Cir. 2022).

2.   On December 14, 2022, the district court denied a post-remand motion to dismiss (ECF No. 28); on January 1, 2023, the district court set a discovery schedule and referred the case to this Court to supervise discovery, with express authority to extend any deadlines. (ECF No. 31.)

3.   The original pre-trial schedule was as follows:

Original Schedule	
Fact Discovery Completion	10/14/23
Dispositive Motions	12/13/23
Retained Experts, Plaintiff	11/13/23
Retained Experts, Defendant	12/13/23
All expert discovery completed	2/29/24

4.   The parties have been working diligently on this case, but plaintiff's counsel has been overwhelmed by the voluminous (15,000 pages) medical records produced by defendant on August 18, 2023.

5.   The parties are about to schedule plaintiff's deposition and depositions of plaintiff's treating physicians. Counsel for both parties have trials set in January of 2024 and propose that the Court approve the following revised schedule:

Proposed Revised Schedule	
Fact Discovery Completion	3/5/24
Dispositive Motions	5/9/24
Retained Experts, Plaintiff	4/5/24
Retained Experts, Defendant	5/9/24
All expert discovery completed	7/29/24

6.   Defendant United States has reviewed and agrees to this proposed revised schedule.

Respectfully submitted,

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