

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

SCHYLER Z. GRODMAN, M.D.,

Plaintiff,

v.

TEXAS TECH UNIVERSITY HEALTH
SCIENCES CENTER,

Defendant.

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Civil Action No. 5:23-cv-00210-H

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT’S PARTIAL MOTION TO DISMISS**

Plaintiff Schyler Grodman, M.D. files this Unopposed Motion for Extension of Time (the “Motion”) seeking an extension of twenty-one days for Plaintiff’s deadline to respond to Defendant Texas Tech University Health Sciences Center’s Partial Motion to Dismiss [ECF Doc. 5], and in support thereof, would respectfully show the Court the following:

1. Plaintiff Schyler Grodman, M.D. (“Plaintiff”) filed its Original Complaint against Defendant on September 7, 2023 [ECF Doc. 1].
2. Defendant Texas Tech University Health Sciences Center (“Defendant”) filed its Partial Motion to Dismiss on October 4, 2023 [ECF Doc. 5].
3. Pursuant to Local Rule 7.1(e), Plaintiff’s current deadline to file its response to Defendant’s Partial Motion to Dismiss is October 25, 2023—seven days from the date of this Motion.
4. Plaintiff requests an extension of time of twenty-one days to file its response to the Partial Motion to Dismiss—from October 25, 2023, to November 15, 2023. Defendant is unopposed to this requested extension.

5. This is the Plaintiff's first request for an extension.

6. Good cause exists for Plaintiff's request because the attorneys responsible for preparing Plaintiff's response brief have been and will be required to devote time to additional matters from October 25, 2023, to November 15, 2023, including multiple jury trials, an arbitration proceeding, and various evidentiary hearings.

7. In addition, the extensive dealings between the Plaintiff and Defendant, the claims at issue in this case, and the nature of the Partial Motion to Dismiss require additional time to address.

8. The requested extension will not prejudice the Defendant nor affect any deadlines in this case.

9. Plaintiff's counsel has conferred with Defendant's counsel and confirmed that Defendant is unopposed to this request for extension of time.

10. Accordingly, Plaintiff respectfully requests the Court grant this Motion and extend its deadline to respond to Defendant's Partial Motion to Dismiss from October 25, 2023, to (and including) November 15, 2023.

11. This request is not for delay but so justice may be done.

12. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court extend the deadline by which it must respond to Defendant's Partial Motion to Dismiss by fourteen days from October 25, 2023, to (and including) November 15, 2023.

Date: October 19, 2023.

Respectfully Submitted,

/s/ Jeffrey M. Tillotson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

Under Local Rule 7.1, I certify that I have complied with Local Rule 7.1 and conferred with Joseph Keeney, counsel for Defendant, via email and telephone on October 17, 2022, and via telephone on October 18, 2023, regarding the substance of the foregoing motion. Counsel for Plaintiff is unopposed to the motion.

/s/ Enrique Ramirez

Enrique Ramirez

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Original Complaint and Jury Demand was electronically filed with the Clerk of the Court using the CM/ECF system on October 19, 2023.

/s/ Jeffrey M. Tillotson

Jeffrey M. Tillotson