

**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
FILE REPLY TO DEFENDANT’S RESPONSE TO PLAINTIFF’S MOTION FOR
LEAVE TO FILE FIRST AMENDED COMPLAINT**

Plaintiff Schyler Grodman, M.D. files this Unopposed Motion for Extension of Time (the “Motion”) seeking an extension of six days for Plaintiff’s deadline to reply to Defendant Texas Tech University Health Sciences Center’s *Response to Plaintiff’s Motion for Leave to File First Amended Complaint* [ECF Doc. 16], and in support thereof, would respectfully show the Court the following:

1. Plaintiff Schyler Grodman, M.D. (“Plaintiff”) filed his *Motion for Leave to File First Amended Complaint* on December 4, 2023 [ECF Doc. 14], removing two claims for discrimination and retaliation under the Americans with Disabilities Act and Texas Commission on Human Rights and adding a Procedural Due Process claim as well as two claims under the Rehabilitation Act against Defendant.

2. Defendant Texas Tech University Health Sciences Center (“Defendant”) filed its *Response to Plaintiff’s Motion for Leave to File Plaintiff’s First Amended Complaint* (the “Response”) on December 22, 2023 [ECF Doc. 16], challenging the majority, but not all, of the claims asserted against Defendant.

3. Plaintiff's current deadline to file its *Reply to Defendant's Response to Plaintiff's Motion for Leave to File First Amended Complaint* ("Reply") is January 5, 2023.

4. Plaintiff requests an extension of time of six days to file its Reply—from January 5, 2024, to January 11, 2024.

5. This is the Plaintiff's first request for an extension for his Reply. Good cause exists for Plaintiff's request because Plaintiff requires additional time due to the intervening holidays, because of the complexity of the issues raised by Defendant's Response, and because the attorneys responsible for preparing Plaintiff's reply brief have been and will be required to devote time to additional matters from January 2, 2024 to January 11, 2024, including various proceedings and hearings.

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

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

8. Accordingly, Plaintiff respectfully requests the Court grant this Motion and extend its deadline file his Reply to Defendant's Response to Plaintiff's Motion for Leave to File First Amended Complaint from January 5, 2024, to (and including) January 11, 2024.

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

10. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court extend the deadline by which he must file his *Reply to Defendant's Response to Plaintiff's Motion for Leave to File First Amended Complaint* from January 5, 2024, to (and including) January 11, 2024.

Date: January 5, 2024

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 on January 5, 2024, 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 January 5, 2024.

/s/ Jeffrey M. Tillotson

Jeffrey M. Tillotson