

**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 TO EXTEND DEADLINE TO DESIGNATE
EXPERTS AND MODIFY CORRESPONDING DEADLINES**

Plaintiff Schyler Grodman, M.D. (“Plaintiff”) files this Unopposed Motion to Extend Deadline to Designate Experts and Modify Corresponding Deadlines (the “Motion”), and respectfully states as follows:

1. The current Scheduling Order (ECF No. 37) sets the following deadlines:
 - a. Initial Expert Designation and Report: **June 6, 2025**
 - b. Responsive Expert Designation and Report: **July 2, 2025**
 - c. Rebuttal Expert Designation: **30 days after responsive designation**
 - d. Close of Discovery: **August 8, 2025**
 - e. Deadline to File Dispositive Motions and Daubert Motions: **August 8, 2025**
2. Plaintiff respectfully requests a 14-day extension of the Initial Expert Designation and Report deadline, from June 6, 2025 to June 20, 2025. Plaintiff further requests that the following deadlines be extended by the same amount of time:
 - a. Responsive Expert Designation and Report: from **July 2, 2025** to **July 16, 2025**;
 - b. Rebuttal Expert Designation: from **August 1, 2025** to **August 15, 2025**;
and

c. Close of Discovery and Deadline to File Dispositive and Daubert Motions: from **August 8, 2025** to **August 22, 2025**.

3. This extension is necessary to allow adequate time to complete expert evaluations, prepare reports, and complete related discovery. The issues in this case involve overlapping fact and expert testimony that require careful development.

4. This is the Plaintiff's first request for such an extension. The requested extension will not prejudice the Defendant nor affect any deadlines in this case. All pretrial and trial deadlines, including the December 8, 2025 trial date, will remain unchanged.

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

6. Counsel for Plaintiff has conferred with counsel for Defendant, who confirmed that Defendant is unopposed to this Motion.

7. This Motion is made in good faith and not for the purpose of delay. The requested extensions will not prejudice either party and will assist in the efficient resolution of the case.

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

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court extend the following deadlines: Initial Expert Designation and Report to June 20, 2025; Responsive Expert Designation and Report to July 16, 2025; Rebuttal Expert Designation to August 15, 2025; Close of Discovery and Dispositive/Daubert Motion Deadline to August 22, 2025.

Date: June 5, 2025

Respectfully Submitted,
/s/ Jeffrey M. Tillotson
Jeffrey M. Tillotson
State Bar No. 20039200
jtillotson@tillotsonlaw.com
Enrique Ramirez-Martinez
State Bar No. 24122158
eramirez@tillotsonlaw.com
TILLOTSON JOHNSON & PATTON
1201 Main Street, Suite 1300
Dallas, Texas 75202
(214) 382-3041 Telephone
(214) 292-6564 Facsimile

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 June 4-5, 2025 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 June 5, 2025.

/s/ Jeffrey M. Tillotson
Jeffrey M. Tillotson