**IN THE DISTRICT COURT OF OKLAHOMA COUNTY**

**STATE OF OKLAHOMA**

JOHN DOE, )

Plaintiff, )

v. ) Case No. CJ-2017-4444

)

JANE SMITH, )

Defendant. )

**JOINT APPLICATION TO CONTINUE PRETRIAL AND EXTEND DEADLINES**

The parties ask the Court to extend the deadlines in the Scheduling Order as set forth below. For the following reasons, this joint motion should be granted.

1. This Court entered a Scheduling Order on December 8, 2017.

2. The Scheduling Order required that Discovery be completed by May 16, 2018.

3. The Scheduling Order set the Pretrial Conference for May 16, 2018 at 2:45 p.m.

4. It has become apparent to all parties in this litigation that additional time is needed as the Plaintiff is still in the early stages of treatment.

5. This Motion is made not to delay, but to allow the parties sufficient time to complete discovery.

6. Counsel for all parties have conferred with their clients, and all parties agree to the extension of the deadlines in this case.

7. The parties are requesting this court to extend all scheduling order deadlines by ninety days, including the Pre-Trial Conference.

WHEREFORE, the parties hereby request this Court approve this Joint Application to extend the Scheduling Order in this matter.

Respectfully,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

PAUL KOURI, OBA# 20751

11221 E I 240 Service Rd

Oklahoma City, OK 73150

Telephone: (405) 347-7140

Facsimile: (800) 590-1966

paul@paulkourilaw.com

**Attorney for Plaintiff**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Joshua B. Bush, OBA# 30508

**Law Office Of Michael H. Githens**

2601 N.W. Expressway,Suite 712 W

Oklahoma City, OK 73112

(405)242-6400 - Telephone

(405)242-6401 - Facsimile

JoBush@geico.com

**Attorney for Defendant**