

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**ALVA JOHNSON, individually and on
behalf of all others similarly situated,**

Plaintiff,

v.

Case No. 8:19-cv-00475-T-02SPF

**DONALD J. TRUMP,
in his individual capacity and
DONALD J. TRUMP FOR
PRESIDENT, INC.,**

Defendants.

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Alva Johnson and Defendants Donald J. Trump (“Mr. Trump”) and Donald J. Trump for President, Inc. (“the Campaign”) (collectively, “the Parties”), through counsel and for good cause shown, jointly request that the Court grant a brief extension to certain deadlines in this case. In support of the Motion the Parties state as follows:

1. Ms. Johnson’s Amended Complaint is currently due July 15, 2019.
2. Ms. Johnson’s Opposition to Defendants’ Motion for a Protective Order (Dkt. 73) is currently due July 24, 2019.
3. Ms. Johnson’s deadline to complete her document production is July 26, 2019.
4. On June 28, 2019, counsel for Ms. Johnson sent a meet-and-confer letter to counsel for Defendants concerning Mr. Trump’s responses and objections to Ms. Johnson’s discovery requests, which were served on June 20, 2019.
5. On July 10, 2019, counsel for Ms. Johnson sent a meet-and-confer letter to counsel for Defendants concerning the Campaign’s responses and objections to Ms. Johnson’s discovery requests, which were served on July 2, 2019.

6. Following the parties' meet-and-confer concerning certain disputed confidentiality designations under the Stipulated Protective Order (Dkt. 61-1), Defendants' deadline to file a motion to maintain those confidentiality designations is currently July 20, 2019.

7. The Campaign's Responses to Ms. Johnson's Third Request for Production of Documents are currently due July 29, 2019.

8. On July 11, 2019, the parties held a hearing before the Court during which the Court stated that the Court would hold the Motion for a Protective Order, Ms. Johnson's Motion to Compel Entry of Court-Ordered ESI Protocol (Dkt. 69) and discovery in abeyance pending filing of the Amended Complaint, and further stated that Plaintiff was permitted to seek an extension of time to file the Amended Complaint.

9. Accordingly, the Parties request that the Court enter an Order extending the aforementioned deadlines as follows:

EVENT	CURRENT DEADLINE	PROPOSED EXTENDED DEADLINE
Plaintiff's Amended Complaint	July 15, 2019	July 29, 2019
Plaintiff's Opposition to the Motion for a Protective Order (Dkt. 73)	July 24, 2019	August 7, 2019
Plaintiff's Document Production	July 26, 2019	August 12, 2019
Defendants' Motion to Maintain Confidentiality Designations	July 20, 2019	August 12, 2019
Campaign's Responses to Ms. Johnson's Third Requests for Production of Documents	July 29, 2019	August 12, 2019
Campaign's Responses to Ms. Johnson's Meet-and-Confer Letters	(No firm deadline)	August 12, 2019

10. This Motion is brought in good faith and not for purposes of delay.

Dated: July 12, 2019

Respectfully Submitted,

/s/ Hassan A. Zavareei
Hassan A. Zavareei (*pro hac vice*)
Katherine M. Aizpuru (*pro hac vice*)
TYCKO & ZAVAREEI LLP
1828 L Street, N.W., Suite 1000
Washington, D.C. 20036
Telephone: 202-973-0900
Facsimile: 202-973-0950
hzavareei@tzlegal.com
kaizpuru@tzlegal.com

Janet Varnell (Fla. Bar No. 71072)
Brian W. Warwick, (Fla. Bar No. 0605573)
VARNELL & WARWICK, PA
P.O. Box 1870
Lady Lake, FL 32158-1870
P: 352-753-8600
F: 352-503-3301
jvarnell@varnellandwarwick.com
bwarwick@varnellandwarwick.com

F. Paul Bland (*pro hac vice*)
Karla Gilbride (*pro hac vice*)
PUBLIC JUSTICE, P.C.
1620 L Street NW, Suite 630
Washington, DC 20036
(202) 797-8600

Jennifer Bennett (*pro hac vice*)
PUBLIC JUSTICE, P.C.
475 14th Street, Suite 610
Oakland, CA 94612
(510) 622-8150

Counsel for Plaintiff

s/ Ryan J. Stonerock
Charles J. Harder (*Pro Hac Vice*)
Trial Counsel
Ryan J. Stonerock (*Pro Hac Vice*)
HARDER LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, California 90212
Telephone: (424) 203-1600
Facsimile: (424) 203-1601

CHarder@HarderLLP.com
RStonerock@HarderLLP.com

Dawn Siler-Nixon
Florida Bar No. 993360
DSiler-Nixon@FordHarrison.com
Tracey K. Jaensch
Florida Bar No. 907057
TJaensch@FordHarrison.com
FORDHARRISON LLP
101 E. Kennedy Blvd., Suite 900
Tampa, Florida 33602
Telephone: (813) 261-7800
Facsimile: (813) 261-7899

Attorneys for Defendants
Donald J. Trump and
Donald J. Trump for President, Inc.