

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

**BRITNEY WALLS, as Special
Administratrix of the Estate of
Bradley Blackshire, Deceased**

PLAINTIFF

V.

NO. 4:19-CV-398-DPM

**OFFICER CHARLES STARKS,
OFFICER MICHAEL SIMPSON,
And THE CITY OF LITTLE ROCK,
ARKANSAS**

DEFENDANTS

**JOINT MOTION TO EXTEND THE DISCOVERY
AND DISPOSITIVE MOTION DEADLINES**

Plaintiff, Britney Walls, as Special Administratrix of the Estate of Bradley Blackshire, Deceased, and Defendants, Officer Michael Simpson and the City of Little Rock, Arkansas, respectfully come before this honorable Court by and through undersigned counsel and, for their Joint Motion to Extend the Discovery and Dispositive Motion Deadlines, state:

1. The current discovery and dispositive motion deadlines are July 16, 2021, and August 18, 2021, respectively. *See* ECF No. 68.
2. As the parties previously apprised the Court, the parties have been diligent in conducting discovery. *See* ECF No. 63.
3. This Court has recently altered the discovery schedule as well as the trial date. ECF No. 68.
4. Before and since the Court set the deadlines above, counsel for Plaintiff and Separate Defendant City of Little Rock (the “City”) and separate Defendant Michael Simpson have

been in confidential settlement discussions. Those discussions previously excluded Defendant Charles Starks, but, at the City's request, now include possible resolution of this entire matter. Due to the complexity of the case and the requirement to secure approval by a public body, the settlement discussions have necessarily moved at a slower pace than the parties would have preferred. However, the parties have continued to work in good faith toward a mutually agreeable resolution of the case.

5. The parties are still working, in good faith, to determine whether this matter can be resolved outside of litigation. To avoid potentially unnecessary costs, expense of attorney time in working on or responding to dispositive and/or *Daubert* motions, Plaintiff and Defendants City and Simpson respectfully request the discovery and dispositive motion deadline again be extended another 60 days.

6. Pursuant to Local Rule 6.2(b), the undersigned counsel reached out to counsel for Separate Defendant Charles Starks to ask if he objected to the requested extension. He advised he objected because he believes an extension would cause a delay in the trial. Plaintiff and Separate Defendants understand that a delay in the trial is a possibility and they accept that possibility without any objection. Even if the trial is delayed, the parties are committed to maintaining the momentum of the settlement discussions and believe it is beneficial to both sides to proceed in an expeditious manner. They also do not see how Separate Defendant Starks would be prejudiced if the trial date is moved in light of the effort to include him in any settlement of the case.

7. Plaintiff and Separate Defendants do not seek this extension in an effort to delay a resolution of this action. Rather, they submit that the settlement discussions have reached the point where settlement is a realistic possibility. However, due to the requirement of seeking approval of a public body and all that entails, additional time is needed.

8. Pursuant to Rule 7.2(d)(1), of the Rules of the United States District Court for the

Eastern and Western Districts of Arkansas, a brief is not submitted in support of this motion.

WHEREFORE, Plaintiff, Britney Walls, as Special Administratrix of the Estate of Bradley Blackshire, Deceased, and Defendants Officer Michael Simpson and the City of Little Rock, Arkansas, pray that the Court will grant their Joint Motion to Extend the Discovery and Dispositive Motion Deadlines, and all other relief to which they may be entitled.

Respectfully submitted,

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