

MOTIONS FOR EXTENSION, ENLARGEMENT, OR SHORTENING OF TIME

6.01: *Motion for Enlargement or Shortening of Time, Extension of Discovery.* Any application, including a proposed consent order, for enlargement or shortening of time (except as otherwise allowed by consent under Local Civil Rules 12.01, 29.01, and 37.01) must be accompanied by an affidavit or other statement giving the reasons therefor.

Motions for extension should also include the following information: (1) the date of the current deadline; (2) whether the deadline has previously been extended; (3) the number of additional days requested, as well as the proposed date of the new deadline; and (4) whether the extension requested would affect other deadlines.¹ A proposed amended scheduling order in the form used by the assigned judge, including all deadlines not then expired, shall be attached to the motion. Motions for extension of time for completion of discovery will be granted only in unusual cases and upon a showing that the parties have diligently pursued discovery during the originally specified period. This showing requires a specification of the discovery (including depositions by witness name and date) which has been completed and the depositions (including witness name) and other discovery which remain to be completed.

6.02: *Protection Requests.* A request for protection from trial or other appearance shall be directed to the judge to whom an action is assigned. Such requests should: (1) identify the action(s) in which protection is sought by short caption and civil action number; (2) identify the dates and reasons for which protection is sought; (3) provide any other information relevant to the request; and (4) comply with any other requirements imposed by the judge to whom the action is assigned.

¹ Scheduling orders generally allow a minimum amount of time between the various deadlines listed in Local Civil Rules 16.01 and 16.02 to ensure the orderly progress of the case. (*E.g.*, sufficient time is required between the motion deadline and trial date to brief and resolve any motion.)