

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

LI FEN YAO,  
as Administrator of the Estate of Sam Mingsan  
Chen

Plaintiff,

v.

ROBERT CHEN, OTTER AUDITS LLC, and RC  
SECURITY LLC,

Defendants.

Case No. 8:23-cv-00889-TDC

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Plaintiff Li Fen Yao, as administrator of the Estate of Sam Mingsan Chen, and Defendants Robert Chen, Otter Audits LLC, and RC Security LLC, hereby respectfully jointly request the Court to modify the Scheduling Order deadlines as set forth in the table below. Defendants' counsel has vacations scheduled in mid-June and mid-August, and Plaintiff's counsel needs additional time for expert disclosures, and therefore the parties jointly request the following modifications to the schedule. This is the parties' first request for a modification to the schedule.

<b>Event</b>	<b>Deadline</b>	<b>Proposed Modified Deadline</b>
Plaintiff's Rule 26(a)(2) expert disclosures	May 28, 2024	<b>August 1, 2024</b>
Defendants' Rule 26(a)(2) expert disclosures	June 24, 2024	<b>August 29, 2024</b>
Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	July 8, 2024	<b>September 12, 2024</b>
Rule 26(e)(2) supplementation of disclosures and responses	July 15, 2024	<b>September 19, 2024</b>

Completion of Discovery; submission of Post-Discovery Joint Status Report, see Part V	August 8, 2024	<b>October 4, 2024</b>
Requests for Admission	August 15, 2024	<b>October 11, 2024</b>
Notice of Intent to File a Pretrial Dispositive Motion	August 22, 2024	<b>October 18, 2024</b>

Dated: May 9, 2024

Respectfully submitted,

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/s/ Rachel Clattenburg  
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/s/ Stephen M. Plotnick  
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*Counsel for Defendants*

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on May 9, 2024 I filed the foregoing using CM/ECF which serves a copy on all counsel of record.

/s/ Rachel Clattenburg

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**ORDER GRANTING  
JOINT MOTION TO MODIFY SCHEDULING ORDER**

Upon consideration of the parties' Joint Motion to Modify Scheduling Order, it is hereby  
this \_\_\_ day of \_\_\_\_\_, 2024:

**ORDERED** that the Joint Motion to Modify is **GRANTED** and the Scheduling Order is  
**MODIFIED** as set forth in the table below:

<b>Event</b>	<b>Deadline</b>	<b>Modified Deadline</b>
Plaintiff's Rule 26(a)(2) expert disclosures	May 28, 2024	<b>August 1, 2024</b>
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**SO ORDERED.**

Date: \_\_\_\_\_, 2024

\_\_\_\_\_  
THEODORE D. CHUANG  
United States District Judge