

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

JULIE A. SU,  
Acting Secretary of Labor,  
United States Department of Labor,

Plaintiff,

v.

UMR, INC.,

Defendant.

**CIVIL ACTION NO. 3:23-CV-00513**

District Judge William M. Conley

Magistrate Judge Anita M. Boor

**JOINT MOTION TO MODIFY  
BRIEFING SCHEDULE FOR DISCOVERY MOTIONS**

Plaintiff Julie A. Su, Acting Secretary of Labor, U.S. Department of Labor (the “Acting Secretary”) and Defendant UMR, Inc. (“UMR”) hereby move to modify the briefing schedule on their pending and forthcoming motions regarding their discovery disputes. The parties jointly state that the following constitutes good cause for this Court to approve the modified schedule set forth below:

1. On October 1, 2024, the Court approved the parties’ modified schedule for their pending and forthcoming motions regarding their discovery disputes. Dkt. 37.
2. The parties are continuing to discuss a potential settlement in this case. To allow the parties to focus on these ongoing discussions, the parties have agreed to modify the discovery briefing schedule as follows:

| Event  | Current Deadline | Modified Deadline |
|--|------------------|-------------------|
| UMR's Opposition to Acting Secretary's Motion and Cross-Motion to Compel | October 9, 2024  | October 21, 2024  |
| Acting Secretary's Opposition to UMR's Motion to Compel                  | October 23, 2024 | November 4, 2024  |

Accordingly, for good cause shown, the parties respectfully request the Court enter the schedule modification set forth above.

Dated: October 7, 2024

*For Defendant:*

/s/ Geoffrey M. Sigler

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/s/ Lydia Faklis

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