

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Candrice Boyd v. Protestant Memorial Medical Center, Inc., d/b/a
Memorial Hospital Belleville

Boyd · No. 3:23-CV-3961-NJR · Decided January 22, 2026

SUMMARY

The United States District Court for the Southern District of Illinois partially grants Defendant’s motion to extend the time for Plaintiff’s deposition, allowing six hours and 27 minutes of additional deposition time through March 2, 2026. The Court denies Plaintiff’s motions to supplement her Second Amended Complaint and her motion for leave to file a limited clarification because supplementation would prejudice Defendant and sur-replies are prohibited under the applicable local rule.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Nancy J. Rosenstengel
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	January 22, 2026
DOCKET	3:23-CV-3961-NJR
DISPOSITION	other
PROCEDURAL POSTURE	The district court ruled on the defendant's second motion to extend the time to complete the plaintiff's deposition and mediation, the plaintiff's motions to supplement the second amended complaint, and the plaintiff's motion for leave to file a limited clarification of a sur-reply.
STANDARD OF REVIEW	Discretionary review of requests for additional deposition time and leave to supplement a pleading; the court applied Federal Rules of Civil Procedure 30(d)(1) and 15(d) and Southern District of Illinois Local Rule 7.1(a)(4).
PRECEDENTIAL VALUE	district court memorandum and order; precedential status not stated
PARTIES	Candrice Boyd v. Protestant Memorial Medical Center, Inc., d/b/a Memorial Hospital Belleville

TOPICS

discovery dispute

motion to amend

civil procedure

mediation

sanctions

PRACTICE AREAS

civil procedure

discovery

pleading practice

health law

QUESTIONS PRESENTED

1. Whether good cause existed under Federal Rule of Civil Procedure 30(d)(1) to extend the time for completing and conducting the plaintiff's deposition.
2. Whether the plaintiff should be permitted under Federal Rule of Civil Procedure 15(d) to supplement her second amended complaint with later-occurring medical-care allegations, records, and related materials.
3. Whether the plaintiff could obtain leave to file a limited clarification of a sur-reply when Southern District of Illinois Local Rule 7.1(a)(4) prohibits sur-replies under any circumstances.

HOLDINGS

1. The court granted the defendant an extension sufficient to complete the remaining two hours and 27 minutes of the deposition and four additional hours, for a total of six hours and 27 minutes, but denied the request for seven additional hours.
2. The plaintiff's motions to supplement the second amended complaint were denied because allowing continual supplementation with medical records, provider messages, and related allegations would unduly prejudice the defendant and would not serve judicial efficiency.
3. The motion for leave to file a limited clarification was denied because Southern District of Illinois Local Rule 7.1(a)(4) prohibits sur-reply briefs under any circumstances.

FACTUAL BACKGROUND

The plaintiff's deposition lasted four hours and 33 minutes after delays, disputes, and the need for guidance from a magistrate judge. The defendant sought the remaining two hours and 27 minutes allowed under the default seven-hour limit plus seven additional hours, citing the length of the plaintiff's second amended complaint, the multiple-year span of events, extensive medical treatment, and numerous medical records. The plaintiff sought to supplement her complaint repeatedly with later medical records, communications with providers, alleged retaliation, and surveillance-related declarations. She also sought leave to file a sur-reply clarification despite the local rule prohibiting sur-replies.

PROCEDURAL HISTORY

The court had previously ordered the parties to conduct the plaintiff's deposition. After only four hours and 33 minutes of deposition time were completed, the defendant sought additional time. The plaintiff separately moved to supplement her second amended complaint with later-occurring facts and exhibits and sought leave to file a clarification after her sur-reply had been stricken under the local rules. The court granted the deposition-extension motion in part, denied it in part, and denied all of the plaintiff's motions.

DISPOSITION

other

CASES CITED

- Chicago Reg'l Council of Carpenters v. Vill. of Schaumburg, 644 F.3d 353, 356 (7th Cir. 2011)
- United States v. Indiana, No. 296-CV-095, 2009 WL 3067087, at *4 (N.D. Ind. Sept. 18, 2009)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-southern-district-of-illinois-united-states-district-court-for/2026/candrice-boyd-v-protestant-memorial-medical-center-inc-d-b-letbry26>