

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

TERESA RHOADES and MICHAEL)	
ALLEN RHOADES, individually and as)	
parents and next friends of C. R., a minor,)	
)	
Plaintiffs,)	
)	
v.)	Cause No. 3:05-CV-0586
)	
PENN-HARRIS-MADISON SCHOOL)	
CORPORATION, DAVID R. TYDGAT,)	
DAVE RISNER, STEVEN HOPE, VICKIE)	
MARSHALL, MARNI CRONK, and)	
MADISON CENTER, INC.,)	
)	
Defendants.)	
)	

**SCHOOL DEFENDANTS’ MOTION FOR EXTENSION
OF TIME TO FILE REPLY BRIEF**

Come now the Defendants, the Penn-Harris-Madison School Corporation, David R. Tydgate, Dave Risner, Steven Hope, Vickie Marshall, and Marni Cronk (hereinafter “School Defendants”), by counsel, and respectfully request an extension of time, to May 6, 2006, in which to file a reply in support of their Motion for Summary Judgment. In support of said motion, the School Defendants would state as follows:

1. The School Defendants filed their Motion for Summary Judgment on February 21, 2006, and the Plaintiffs filed their response on March 22, 2006. The School Defendants’ reply is currently due on or before April 6, 2006.

2. That counsel for the School Defendants returned to the office on March 29, 2006, from a week long vacation out of the country and due to other pressing matters, including a Motion for Reconsideration in the matter of Pahmeier v. Marion Community Schools, et al., currently pending in the United States District Court, under Cause No. 1:04-CV-0365, due on

March 31, 2006; a statement of position due on April 6, 2006, in the matter of Donetta Groves v. the Greater Clark County Schools, pending before the U.S. Equal Employment Opportunity Commission under Charge Number 474-2006-00357; and being scheduled to attend and speak at the National School Boards Association, Council of School Attorneys' 2006 School Law Seminar, in Chicago Illinois, beginning April 6, 2006, requires additional time in which to file a reply in support of their Motion for Summary Judgment.

3. That counsel for the Plaintiff has no objection to this extension of time.

WHEREFORE, the School Defendants, the Penn-Harris-Madison School Corporation, David R. Tydgat, Dave Risner, Steven Hope, Vickie Marshall, and Marni Cronk by counsel, respectfully request an extension of time of to and including May 6, 2006, in which to file a reply in support of their Motion for Summary Judgment, and for all other just and proper relief in the premises.

LOCKE REYNOLDS LLP

By: /s/Thomas E. Wheeler

Thomas E. Wheeler, II, #13800-49

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2006, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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