

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

TERESA RHOADES and MICHAEL )  
ALLEN RHOADES, individually and )  
as parents and next friends of )  
CHELSEA RHOADES, a minor, )

*Plaintiffs,* )

vs. )

Case No. 3:05-cv-0586

PENN-HARRIS-MADISON SCHOOL )  
CORPORATION, *et al.*, )

*Defendants.* )

**MOTION TO EXTEND**  
**PLAINTIFFS' EXPERT REPORT DEADLINE**

COME NOW the Plaintiffs, by Counsel, and respectfully petition the Court as follows:

1. On December 7, 2006, this Court entered a Scheduling Order and Memorandum of Status Conference signed by Magistrate Judge Christopher A. Nuechterlein.

2. Said Scheduling Order established a deadline for the serving of reports from retained experts from Plaintiffs of March 30, 2007.

3. The Plaintiffs' expert witness will require an additional thirty (30) days from the current scheduling deadline to review, prepare and submit a report, i.e. until April 30, 2007.

4. Counsel for all Defendants have been contacted and have no objection to said Motion to Extend Deadline.

5. This Motion is not made for the purposes of unwarranted delay and does not prejudice the Defendants in this cause.

WHEREFORE, the Plaintiffs, by Counsel, would respectfully request the Court to extend the Plaintiffs' Expert Report deadline from the current deadline of March 30, 2007, by thirty days (30) days, until April, 30, 2007; and for all other relief just and proper in the premises.

DATED this 20<sup>th</sup> day of March, 2007.

Respectfully submitted,

JOHN R. PRICE & ASSOCIATES

s/John R. Price  
John R. Price,  
Counsel for Plaintiffs

PARTICIPATING ATTORNEY FOR  
THE RUTHERFORD INSTITUTE

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2007, a copy of the foregoing *Motion to Extend Plaintiffs' Expert Report Deadline* 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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