

UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF INDIANA
SOUTH BEND DIVISION

THERESA RHOADES and MICHAEL)
ALLEN RHOADES, individually and)
as parents and next friends of)
CHELSEA RHOADES, a minor)
)
Plaintiffs,)
)
v.)
)
PENN HARRIS MADISON SCHOOL)
CORPORATION, et al.)
)
Defendants.)

Case No.: 3:05-cv-0586

**DEFENDANT, MADISON CENTER, INC'S,
MOTION TO EXTEND DEFENDANT'S EXPERT REPORT DEADLINE**

COMES NOW Defendant, Madison Center, Inc., (hereafter "Madison Center") by counsel, and respectfully petitions 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 Madison Center on May 30, 2007.
3. Undersigned counsel is currently in the process of scheduling the depositions of Plaintiffs' expert witness. Once that deposition takes place, Madison Center will be in a position to identify an expert (if needed) to combat the opinions given by Plaintiffs' expert.
4. Counsel for Plaintiffs has been contacted and has 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 other parties in this cause.

WHEREFORE, the Defendant, Madison Center, Inc., by counsel, would respectfully request the Court to extend Madison Center's Expert Report deadline from the current deadline of May 30, 2007, by thirty (60) days, until July 30, 2007, and for all other relief just and proper in the premises.

DATED this 29th day of May, 2007.

/s/ Georgianne M. Walker
(23182-71)
Attorney for Madison Center, Inc.

MAY • OBERFELL • LORBER
4100 Edison Lakes Parkway, Suite 100
Mishawaka, IN 46545
Telephone: (574) 243-4100
Facsimile: (574) 232-9789

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by way of the Court's electronic filing system. Parties may access this filing through the Court's system.

John R. Price
John R. Price & Associates
9000 Keystone Crossing, Suite 150
Indianapolis, IN 46240

Marsha Volk Bugalla
Thomas E. Wheeler, II
Anthony W. Overhold
Lock Reynolds LLP
201 North Illinois Street, Suite 1000
Post Office Box 44961
Indianapolis, Indiana 46244-0961

/s/ Georgianne M. Walker