

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.)

AGREED MOTION FOR EXTENSION OF DEADLINES

COME NOW the Plaintiffs, by Counsel, joined by the Defendants who have approved the filing of this Motion, respectfully move the Court as follows:

1. The discovery deadline and the deadline for Defendants to file expert reports in this cause is currently set for July 30, 2007. The deadline to object to expert witnesses and the deadline for dispositive motions is August 30th.

2. The Plaintiffs' expert witness Dr. Karen R. Effram has a family medical problem and is unable to submit to a deposition, pursuant to the request of the Defendants, in the month of July.

3. Consequently, it will be necessary to extend the deadlines to allow the Defendants to depose the Plaintiffs' expert witness, and to respond accordingly.

4. It is believed that the deposition of said expert witness should be completed during the month of August, 2007, based upon the current medical situation faced by said expert witness.

5. The parties request the Court to extend the deadlines as follows: discovery deadline and deadline for Defendants to file expert reports – September 30, 2007; deadline for objections to expert witnesses and for dispositive motions – October 30, 2007.

6. Counsel for all Defendants have specifically agreed to and authorized the filing of this Motion.

7. 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, joined by the Defendants herein, would respectfully request the Court to extend the deadline herein as follows: discovery deadline and deadline for Defendants to file expert reports – September 30, 2007; deadline for objections to expert witnesses and for dispositive motions – October 30, 2007; and for all other relief just and proper in the premises.

DATED this 3rd day of July, 2007.

Respectfully submitted,

JOHN R. PRICE & ASSOCIATES

s/John R. Price

John R. Price,
Counsel for Plaintiffs

PARTICIPATING ATTORNEY FOR
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CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2007, a copy of the foregoing *Agreed Motion for Extension of Discovery Deadlines* 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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s/John R. Price
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