

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

HEARTLAND RECREATIONAL VEHICLES, LLC)	
)	
Plaintiff,)	
)	Case No. 3:08-CV-490 AS CAN
vs.)	
)	
FOREST RIVER, INC.)	
)	
Defendant.)	

JOINT MOTION FOR EXTENSION OF DEADLINES

Heartland Recreational Vehicles, LLC ("Heartland") and Forest River, Inc. ("Forest River") hereby jointly move to extend multiple deadlines in the above-captioned case. The parties are diligently working and cooperating to complete discovery in this matter. However, as the parties cautiously predicted at the March 24, 2010 pre-trial conference, scheduling and administrative difficulties have occurred, thus creating the need to extend the deadline for completion of discovery. The parties believe that an extension of approximately 60 days will be sufficient to allow for the completion of their desired discovery.

An extension of the deadline for discovery will also lead to a need to extend the deadlines for the filing of supplemental expert reports and the filing of dispositive motions. Therefore, Heartland and Forest River jointly and respectfully request that the Court enter an order resetting the above-noted deadlines for the following dates:

- (1) Deadline for completion of discovery: **August 2, 2010;**
- (2) Deadline for the filing of supplemental expert reports, if needed: **July 23, 2010;**
- (3) Deadline for the filing of dispositive motions: **August 17, 2010.**

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned counsel for plaintiff Heartland Recreational Vehicles, LLC, hereby certifies that a copy of the foregoing was served upon the following parties, this 3rd day of June, 2010 by operation of the Court's electronic filing system:

Ryan M. Fountain
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/s/ David P. Irmischer _____

David P. Irmischer