

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. Heartland has produced substantial financial records in compliance with the Court's Order on Forest River's Second Motion to Compel (Order, DE # 112), and the parties are currently cooperating to ensure that all discovery of documents is completed before they take any final depositions with respect to these records. However, because of the complex nature of these documents, the need for the parties' experts to comprehensively review them, and additional scheduling difficulties, the parties request an extension of approximately 75 days to complete 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: **October 15, 2010;**

- (2) Deadline for the filing of supplemental expert reports, if needed: **October 1, 2010;**
- (3) Deadline for the filing of dispositive motions: **November 2, 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 26th day of July, 2010 by operation of the Court's electronic filing system:

Ryan M. Fountain
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/s/ David P. Irmscher

David P. Irmscher