

UNITED STATES DISTRICT COURT
Northern District of Indiana
South Bend Division

HEARTLAND RECREATIONAL)	
VEHICLES, LLC,)	
Plaintiff,)	
)	CASE NO.: <u>3:08-cv-490</u>
v.)	
)	
FOREST RIVER, INC.,)	JURY DEMAND
Defendant.)	

FOREST RIVER’S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO HEARTLAND’S MOTION FOR PROTECTIVE ORDER QUASHING SUBPOENAS TO NON-PARTIES

Pursuant to Local Rule 6.1(b), Forest River respectfully requests a second one day extension of time in which to submit its response to Heartland’s Motion (docket #57 in this case) due to continued and unexpected personal obligations of Plaintiff’s counsel. That response was initially due Friday, October 16, 2009, then was extended to be due today, and now would be due on Tuesday, October 20, 2009, with this extension. The undersigned counsel spoke with David Irmischer, Heartland’s lead counsel of record, today concerning this request and was informed that Heartland does not oppose this request. A proposed form of order has been forwarded to chambers herewith.

Dated: October 19, 2009

Respectfully submitted,

s/Ryan M. Fountain

Ryan M. Fountain (#8544-71)

RyanFountain@aol.com

420 Lincoln Way West
Mishawaka, Indiana 46544

Telephone: (574) 258-9296

Telecopy: (574) 256-5137

Attorney for Defendant Forest River, Inc.

Certificate of Service

I certify that on October 19, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF system, which sent notification of such filing to all of the parties through at least the following counsel of record:

David P. Irscher david.irmscher@bakerd.com

Abigail M. Butler abidgail.bulter@bakerd.com

s/Ryan M. Fountain

Ryan M. Fountain

Attorney for Defendant Forest River, Inc.