

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
SHIRLEY L. PHELPS-ROPER,
REBEKAH A. PHELPS-DAVIS, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No. 06-CV-1389 RDB

PLAINTIFF'S MOTION TO CONTINUE THE HEARING ON APRIL 3, 2008

Plaintiff Albert Snyder, by and through counsel, respectfully requests leave of Court to continue the hearing scheduled for April 3, 2008, and in support thereof states as follows:

1. On March 5, 2008, this Honorable Court ordered that defendants submit certain financial documents to chambers.
2. At the same time, plaintiff was instructed that he may inspect the documents submitted to chambers but was required to inspect the documents in chambers.
3. On March 27, 2008, defendants Westboro Baptist Church, Inc. and Fred Phelps, Sr. submitted the aforementioned documents to chambers.
4. On March 25, 2008, defendants Phelps-Roper and Phelps-Davis submitted the aforementioned documents to chambers.
5. Before plaintiff can make a decision concerning the necessity of requesting a hearing, plaintiff must review the aforementioned documents.
6. Based upon the timeline, plaintiff's counsel cannot inspect the documents prior to April 3, 2008.

7. Consequently, plaintiff is requesting a continuance to a mutually agreeable date in the future, if necessary.

WHEREFORE, plaintiff Albert Snyder respectfully requests that this Honorable Court grant a continuance of the April 3, 2008 hearing.

BARLEY SNYDER LLC

/s/ Sean E. Summers

By: _____

Paul W. Minnich
Sean E. Summers
100 East Market Street
P.O. Box 15012
York, PA 17405-7012
(717) 846-8888

Craig T. Trebilcock
Shumaker Williams PC
1 East Market Street
York, PA 17401
(717) 848-5134

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this date true and correct copies of Plaintiff's Motion are being served in the following manner:

Via ECF:

Jonathan R. Katz, Esq.

Via First Class Mail:

Shirley L. Phelps-Roper
3640 Churchill Road
Topeka, KS 66604

Rebekah A. Phelps-Davis
1216 Cambridge
Topeka, KS 66604

BARLEY SNYDER LLC

/s/ Sean E. Summers

By: _____

Paul W. Minnich
Sean E. Summers
100 East Market Street
P.O. Box 15012
York, PA 17405-7012
(717) 846-8888

Date: March 28, 2008

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
SHIRLEY L. PHELPS-ROPER,
REBEKAH A. PHELPS-DAVIS, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No. 06-CV-1389 RDB

CERTIFICATE OF CONCURRENCE/NON-CONCURRENCE

I hereby certify that I contacted counsel for defendants, Jon Katz, and pro se defendants, Shirley L. Phelps-Roper and Rebekah A. Phelps-Davis, with regard to the Motion to Continue Hearing Scheduled for April 3, 2008, and they have not definitively concurred in the Motion. Their response is attached as Exhibit A. In the interest of caution and based upon the need to file a timely Motion, the within Motion is being filed. The undersigned will notify the Court if any responses are changed.

BARLEY SNYDER LLC

By: _____/s/ Sean E. Summers_____

Sean E. Summers
Paul Minnich
100 East Market Street
P.O. Box 15012
York, PA 17405-7012
(717) 846-8888

Craig T. Trebilcock
Shumaker Williams PC
1 East Market Street
York, PA 17401
(717) 848-5134