

1 Plaintiff's Motion for Summary Judgment and for the Parties to file the Joint Pretrial
2 Order. Plaintiff's counsel (Dann Law) is preparing for a trial and Plaintiff's other counsel
3 (Freedom Law Firm) was out of the office from April 11, 2022 to April 18, 2022. Defense
4 counsel is dealing with moving his mother and dealing with deadlines in other matters. This
5 extension is requested in good faith and is not for purposes of delay or prejudice to any party.

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7 **Procedural History**

8 On March 17, 2022, Plaintiff filed her Motion for Summary Judgment. (ECF No. 62).
9 Defendants filed their Response in Opposition to Plaintiff's Motion for Summary Judgment
10 on April 7, 2022. (ECF No. 63). Plaintiff's Reply is due April 21, 2022.

11 THEREFORE, the Parties hereby stipulate and agree to extend the deadline for
12 Plaintiff's to file a Reply to May 5, 2022. Parties also hereby stipulate and agree to extend the
13 deadline to file the Joint Pretrial Order to May 12, 2022.

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IT IS SO STIPULATED.

DATED: April 20, 2022

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FREEDOM LAW FIRM

WALDMAN & PORRAS, PLLC

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GEORGE HAINES, ESQ.
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LISA BRYANT

By: /s/Nicholas M. Porras
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Attorney for Defendants
MADISON MANAGEMENT SERVICES,
LLC, AND PORRAS, PLLC

DANN LAW FIRM

By: /s/ Marc E. Dann
Marc E. Dann, Esq.
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2728 Euclid Avenue, STE 300
Cleveland, OH 44115
Counsel for Plaintiff Lisa A. Bryant

IT IS SO ORDERED


UNITED STATES DISTRICT JUDGE

Dated: 05/09/2022