

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

J.S., et al.)	
)	
v.)	No: 3:07-cv-585
)	
BLUE MOUNTAIN SCHOOL)	
DISTRICT, et al.,)	
)	ELECTRONICALLY FILED
_____)	

**UNOPPOSED MOTION FOR EXTENSION OF DISCOVERY AND CASE
MANAGEMENT DEADLINES**

Plaintiffs, J.S. and her parents, respectfully request an enlargement of all deadlines associated with this matter at a period of sixty (60) days, and in support thereof, avers the following:

1. This case involves relatively complicated issues of constitutional law that turn on the specific facts of the situation.
2. The current deadline for discovery is August 21, 2007.
3. Discovery in this matter has been somewhat delayed, in part, but the intervention of summer vacations and the unavailability of Plaintiffs’ counsel.
4. Plaintiffs will be bringing in additional counsel who have needed some time to become familiar with the case.

5. An additional 60 days should provide ample time for the parties to complete needed discovery.

6. Even with the proposed extension, this case should be ready for trial well within the Court's customary schedule for case completion.

7. Counsel for Defendants concurs in this request.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court extend by 60 days the discovery and dispositive motion deadlines set forth in the Court's Case Management Order of May 11, 2007. A form of order is submitted herewith.

Respectfully submitted,

Date: August 14, 2007.

/s/ Mary Catherine Roper

Mary Catherine Roper

AMERICAN CIVIL LIBERTIES FOUNDATION OF
PENNSYLVANIA

P.O. Box 40008

Philadelphia, PA 19106

(T) 215.592.1513 ext. 116

(F) 215.592-1343

mroper@aclupa.org

Deborah Gordon

EDUCATION LAW CENTER-PA

1315 Walnut St., Suite 400

Philadelphia, PA 19107

(T) (215) 238-6970, ext. 313

(F) (215) 772-3125

dgordon@elc-pa.org

Attorneys for Plaintiffs

Certificate of Concurrence Pursuant to LR 7.20

On or about August 3, 2007, the undersigned counsel for Plaintiffs spoke with Defendants' counsel, Ellis Katz, by telephone, and Mr. Katz stated that the Defendants concur in Plaintiffs' Motion for Extension of Discovery and Case Management Deadlines.

/s/ Mary Catherine Roper
MARY CATHERINE ROPER
PA ID No. 71107
AMERICAN CIVIL LIBERTIES
UNION OF PENNSYLVANIA
P.O. Box 40008
Philadelphia, PA 19106
Tel.: (215) 592-1513 ext. 116
Fax: (215) 592-1343
Email: mroper@aclupa.org

CERTIFICATE OF SERVICE

I, Mary Catherine Roper, hereby certify that on this day, the foregoing was filed with the Court and counsel below, being registered with the Court's ECF service, received service thereof:

Ellis Katz, Esq.
Sweet, Stevens, Katz & Williams LLP
331 E. Butler Ave.
New Britain, PA 18901
Phone: (215) 345-9111
Fax: (215) 348-1147

Dated: August 14, 2007.

/s/ Mary Catherine Roper
Mary Catherine Roper