

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

JOSEPH R. REISINGER,	:	CIVIL ACTION – LAW
	:	
Plaintiff,	:	
	:	JURY TRIAL DEMANDED
v.	:	
	:	
THE CITY OF WILKES BARRE, et al.	:	(Hon. Richard P. Conaboy)
	:	
Defendants.	:	No. 3:09-CV-210

**MOTION TO EXTEND THE
DISPOSITIVE MOTIONS AND EXPERT REPORT DEADLINES**

NOW COMES, the Plaintiff by his attorneys THE LOFTUS LAW FIRM, P.C. and moves to extend the Dispositive Motion and Expert Report deadlines as follows:

1. The Dispositive Motion deadline is January 20, 2010.
2. Discovery deadlines were extended sixty (60) days which take it beyond January 20, 2010.
3. The extension of time of the Dispositive Motion deadline to March 20, 2010 would subsequently place the Dispositive Motion deadline after discovery had been completed as it now stands.

4. The Plaintiff's expert report was due on December 31, 2009, however due to an accident in which the Plaintiff was involved and suffered injuries he was unable to meet with the expert to complete the report.

5. Therefore, the Plaintiff requests that the time for the Plaintiff's expert report be extended to January 31, 2010.

6. Correspondingly, the Defendants' expert reports would be then extended to March 31, 2010.

7. Both attorneys, Fogerty and Brobst have concurred in this Motion.

WHEREFORE, it is respectfully requested that the Dispositive Motion deadline be extended to March 20, 2010; Plaintiff's Expert Deadline to January 31, 2010 and the Defendants' Expert Reports to March 31, 2010.

Respectfully Submitted,

THE LOFTUS LAW FIRM, P.C.

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