

**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 FOR ENLARGEMENT OF TIME OF DISCOVERY AND
TO FILE DISPOSITIVE MOTIONS**

NOW COMES, the Plaintiff by his attorneys THE LOFTUS LAW FIRM, P.C. and moves for an enlargement of time of sixty (60) days for the close of Discovery and to file Dispositive Motions as follows:

1. The close of discovery in this matter is January 31, 2010.
2. The time for Dispositive Motions is March 20, 2010.
3. The Defendants had scheduled the Plaintiff’s Deposition for January 26, 2010.
4. Due to an injury sustained by the Plaintiff on December 29, 2009, the Plaintiff is unable to be deposed on January 26, 2010.
5. A copy of his doctor’s correspondence is attached hereto intend to be made part hereof and marked Exhibit “A”.

6. The Plaintiff's witnesses are scheduled to be deposed on Thursday, January 28, 2010, but the Plaintiff would be unable to attend.

7. Due to the Plaintiff's inability to attend either deposition, the parties have mutually agreed to enlarge the Discovery deadline by sixty (60) days in order to reschedule the depositions.

8. The time for filing Dispositive Motions is March 31, 2010.

9. In order to be able to file the Dispositive Motions after the Discovery Deadline, sixty (60) days is also requested for the Dispositive Motions Deadline.

WHEREFORE, it respectfully requested that both the Discovery deadline and the Dispositive Motions deadline be enlarged by sixty (60) days.

Respectfully Submitted,

THE LOFTUS LAW FIRM, P.C.

/s/ Peter G. Loftus, Esquire
Peter G. Loftus, Esquire
Attorney ID #09943
Box V, 1207 North Abington Road
Waverly, PA 18471
(570) 586-8604