

**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

**PLAINTIFF’S REPLY TO THE ANSWER OF DEFENDANT
MICHAEL KERMEC AND THE CADLE II, INC. TO PLAINTIFF’S
MOTION FOR EXTENSION OF TIME**

NOW COMES, the Plaintiff by his attorneys THE LOFTUS LAW FIRM, P.C. and replies to the Defendant Kermec and Cadle’s Objections as follows:

Plaintiff has no objection to extending the Defendants’ expert deadline which was understood to be extended in the original Motion. The extension should not be limited to taking depositions of the Plaintiff and his witnesses.

Obviously, it is quite common that after the deposition of any party, the parties may desire to depose other witnesses who may be identified or who may information pro or con concerning what the one party’s witnesses have to offer. Similarly, additional document requests or interrogatories may be appropriate to obtain information raised during the course of the depositions.

Subsequently, to limit the extension to only Mr. Reisinger's deposition would be prejudicial to the Plaintiff and may indeed actually harm the Defendants prohibiting them from gathering other information that may arise during the depositions.

WHEREFORE, it is respectfully requested that the Defendants response be denied as to Section (ii).

Respectfully submitted,

THE LOFTUS LAW FIRM, P.C.

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