

**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;	:	
THOMAS LEIGHTON;	:	
FRANCES KRATZ;	:	(Judge Conaboy)
GREGORY BARROUK;	:	
MICHAEL KERMEC and	:	
THE CADLE COMPANY II, INC.	:	
Defendants	:	No. 3:09-CV-210

**MOTION FOR ENLARGEMENT OF TIME TO
PRODUCE EXPERT REPORTS**

NOW COMES the Plaintiff, Joseph R. Reisinger, *pro se*, and requests that this Court grant an enlargement of time for the expert report deadlines in the above-captioned matter as set forth herein:

1. The Plaintiff's expert reports are due on or before May 30, 2010.
2. The Plaintiff's discovery is scheduled to end on June 30, 2010.
3. The Plaintiff alleges in the Complaint substantial financial damages because of the alleged misconduct of the Defendants as set forth in the Complaint.
4. The Plaintiff's accountants, in order to determine the financial damages that the Plaintiff has suffered because of the misconduct of the Defendants, first needs to obtain copies of the financial information in regard to all of the rental income and all of the expenses related to 26 of the Plaintiff's properties from December 13, 2006 to present date, and the Cadle Company II, Inc. ("Cadle") one of the named Defendants, has sole access to that information.

5. Further, the Plaintiff needs access to copies of the information related to what Cadle paid for the 26 notes and 29 mortgages related to the Plaintiff's 26 properties, for his accountants to properly calculate the debt service, etc., related to those 26 rental properties in determining the amount of his actual financial damages, and Cadle again has sole access to that information.

6. Finally, the Plaintiff needs to receive a copy of each of the loan histories related to the recordation of all of the prior debt service payments made by the Plaintiff, related to his above 26 notes, to both Cadle and all of the prior owners of his notes, and Cadle again has sole possession of all of the financial information.

7. The Plaintiff submitted a Request for Production of Documents to Cadle, on May 12, 2010, requesting all of the above information, and said information is due to the Plaintiff on or before June 11, 2010, and a copy of the above Request for Production of Documents is attached as Exhibit A, Plaintiff's First Request for Production of Documents Directed to the Cadle Defendants.

8. Once the Plaintiff receives all of the above requested information, he will then need an additional 30 days to complete, with his accountants, all of the calculations necessary to support the amount of the actual financial damages that the Plaintiff suffered with regard to the misconduct of the Defendants alleged in the Complaint.

9. In sum, from a timing perspective, (i) the Plaintiff's expert reports are due on May 30, 2010, (ii) the Plaintiff will not receive the needed information set forth above from Cadle until June 11, 2010, and (iii) the Plaintiff's accountants will need at least thirty (30) days, until July 12, 2010, to make all of the calculations necessary to evidence the actual financial damages

that the Plaintiff has sustained due to all of the misconduct of the Defendants alleged in the Complaint.

10. Because of the above, the Plaintiff is requesting that the date that his expert reports are due be extended from May 30, 2010 until July 12, 2010.

11. All opposing counsel do not concur with this request.

WHEREFORE, because of all of the above, it is respectfully requested that this Court grant an extension of time, until July 12, 2010, for the Petitioner to prepare and submit the Petitioner's expert reports, in regard to establishing the actual financial damages he sustained due to the misconduct by the Defendants, as alleged by the Plaintiff in the Complaint, with the Plaintiff's financial expert reports now due on or before July 12, 2010.

Respectfully Submitted,

/s/ Joseph R. Reisinger

Joseph R. Reisinger, Esq.