

**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 that he has suffered substantial physical and emotional damages due to the outrageous and intentional misconduct of the Defendants as alleged in the Complaint.
4. The Plaintiff, in order to ascertain the extent of the physical and emotional damages that he has suffered due to the outrageous and intentional conduct of the Defendants, has consulted and spoken extensively with Dr. Richard E. Fischbein, M.D., a renowned forensic psychiatrist.
5. Further, the Plaintiff is scheduled to have his next session with Dr. Fischbein on June 2, 2010.

6. Also, Dr. Fischbein has advised the Plaintiff that he will not be able to have his full report regarding the extent of the Plaintiff's physical and emotional damages completed until June 30, 2010.

7. Therefore, because Dr. Fischbein will not be able have his full report completed until June 30, 2010, the Plaintiff will not be able to produce this expert report until after that date.

8. Because of the above, the Plaintiff is respectfully requesting that the date that this expert report is due be extended from May 30, 2010 until July 1, 2010.

9. If the enlargement of time is granted, Plaintiff agrees to allow Defendants an additional thirty (30) days from the time of Plaintiff's filing of Dr. Fischbein's report to secure and produce an expert report in response thereto.

10. Defendants City of Wilkes-Barre, Thomas Leighton, Francis Kratz and Gregory Barrouk concur with the granting of this enlargement.

11. Defendants Michael Kermec and the Cadle Company II, Inc. do not concur with this request. .

WHEREFORE, because of all of the above, it is respectfully requested that this Honorable Court grant 1) an extension of time, until July 1, 2010, for the Plaintiff to submit the Plaintiff's expert report, in regard to establishing his physical and emotional damages that he sustained due to the outrageous and intentional misconduct by the Defendants, as alleged by the Plaintiff in the Complaint, with the Plaintiff's forensic psychiatrist's expert report now being due on or before July 1, 2010, and 2) an extension of thirty (30) days until July 31 for the Defendants to produce their respective expert reports responding to Dr. Fischbein's report.

Respectfully Submitted,

/s/ Joseph R. Reisinger
Joseph R. Reisinger, Esq.