

**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

**PLAINTIFF’S MOTION FOR ENLARGEMENT
OF TIME OF AN ADDITIONAL FORTY-EIGHT (48) HOURS TO FILE
PLAINTIFF’S RESPONSE**

The Plaintiff, Joseph R. Reisinger (the “Plaintiff”), *pro se*, is filing this Motion and hereby respectfully requests that this Honorable Court grant him an enlargement of time of an additional forty-eight (48) hours, until Thursday, October 28, 2010, within which to file his response to the Briefs filed by the City Defendants and the Cadle Defendants, in the above action, and in support hereof, avers the following:

1. On October 25, 2010, the Plaintiff filed a Motion for Enlargement of Time of Twenty-Four (24) Hours to Plaintiff’s Response because the Plaintiff’s

lead paralegal, Becky Manfre (“Becky”), was suffering from food poisoning type symptoms, and would not be able to come to work that day.

2. Therefore, the Plaintiff requested that this Honorable Court grant him an enlargement of time of twenty-four (24) hours to file his response, which this Court very graciously granted.

3. Yesterday, Becky indicated that she believed that she would be recovered enough to be back in work early this morning, or by noon at the latest.

4. However, Becky has now indicated that she is still very ill and will not be able to make it into work at all today because she has now been diagnosed as having the flu, and not food poisoning, as was previously thought, and, as a result, is completely bed-ridden.

5. Becky is awaiting her full medical diagnosis, but she is cautiously hopeful that she will be able to return to work tomorrow.

6. Becky’s two day absence has proven to be extremely problematic in the Plaintiff’s office because the Plaintiff relies heavily on her for word processing.

7. The profound effect of Becky’s absence is further compounded by the fact that Ann Marie, who also did word processing for the Plaintiff, had her last day of employment with the Plaintiff last Wednesday, October, 20, 2010, because she has decided to go back to school to pursue a career in the medical field because her father is a physician.

8. The Plaintiff has not at this time had an opportunity to seek a replacement for Ann Marie, because of Becky's illness, because Becky would be assigned that responsibility, if she had come to work this week.

9. Therefore, with Becky being out sick and Ann Marie no longer employed by the Plaintiff, the Plaintiff's ability to prepare any documents in the above case is severely limited.

10. The Plaintiff is hopeful that Becky will be able to make it back to work tomorrow and that he can promptly finish his responses.

11. Therefore, it was initially the thought of the Plaintiff to only ask this Honorable Court for an extension of an additional twenty-four (24) hours so as to not impose too greatly on the Court.

12. However, because Becky is still awaiting her full medical diagnosis, the Plaintiff believes that it would be best to respectfully request that this Court grant him an extension of an additional forty-eight (48) hours until Thursday, October 28, 2010, to complete his responses.

13. This will ensure that the Plaintiff can finish his responses by Thursday, October 28, 2010, in the above case, regardless of Becky's condition tomorrow, by seeking the assistance of other persons, to complete the Plaintiff's responsibilities in this case.

14. As a consequence of all of the above, the Plaintiff is therefore requesting that this Honorable Court grant him an additional forty-eight hour (48) extension of time until Thursday, October 28, 2010, for the Plaintiff to comply with this Court's October 19, 2010 Order.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant him, for all of the above reasons, an enlargement of time of an additional forty-eight (48) hours, until Thursday, October 28, 2010, within which to file his response to the Briefs filed by the City Defendants and the Cadle Defendants.

Respectfully submitted,

/s/Joseph R. Reisinger
Joseph R. Reisinger, *pro se*

444 S. Franklin St.
Wilkes-Barre, PA 18702
Tel: (570) 823-3377
Fax: (570) 823-8890
jrrpc@verizon.net