

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ELIZABETH MORT and ALEX )  
RODRIGUEZ, )

Plaintiffs, )

v. )

LAWRENCE COUNTY CHILDREN )  
AND YOUTH SERVICES; LAWRENCE )  
COUNTY, CHRISSY MONTAGUE, Lawrence )  
County Children and Youth Services )  
Caseworker; and JAMESON HEALTH )  
SYSTEM, INC. )

Defendants. )

C.A. No.: 10-01438

**MOTION FOR EXTENSION OF DISCOVERY AND PRETRIAL DEADLINES**

AND NOW comes one of the defendants, Jameson Health System, Inc., by and through its attorneys, Dickie McCamey & Chilcote, P.C., John C. Conti, Esquire, Richard J. Kabbert, Esquire, and J. Brian Lynn, Esquire, and hereby submits the following Motion for Extension of Discovery and Pretrial Deadlines:

1. On February 25, 2011, this Honorable Court entered a Case Management Order in the above referenced matter, setting forth various discovery and pretrial deadlines.
2. While some discovery has taken place in this case, the parties have conferred and counsel for plaintiffs and defendants all agree that additional time is needed in order to complete written discovery and depositions.
3. In order to allow sufficient time to conduct discovery and to comply with other pretrial matters in this case, it is hereby requested that the discovery and pretrial deadlines set

forth in this Honorable Court's February 25, 2011, Case Management Order be extended one hundred and twenty (120) days.

4. No previous extensions of the discovery and pretrial deadlines have been requested by any of the parties.

5. The modified discovery and pretrial deadlines are set forth in the accompanying Order of Court.

WHEREFORE, Jameson Health System, Inc., hereby requests that the discovery and pretrial deadlines set forth in this Honorable Court's February 25, 2011, Case Management Order be extended one hundred and twenty (120) days.

s/ Richard J. Kabbert

John C. Conti  
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Richard J. Kabbert  
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J. Brian Lynn  
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Attorneys for Defendant,  
Jameson Health System, Inc.

**CERTIFICATE OF SERVICE**

I, Richard J. Kabbert, Esquire, hereby certify that a true and correct copy of the foregoing Motion for Extension of Discovery and Pretrial Deadlines has been filed this 25<sup>th</sup> day of July, 2011, by electronic filing through the Court's CM/ECF electronic filing system, to be served by operation of the Court's electronic system upon the following:

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s/ Richard J. Kabbert

Richard J. Kabbert

Attorneys for Defendant,  
Jameson Health System, Inc.