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

ELIZABETH MORT and ALEX)
RODRIGUEZ,)
)
Plaintiffs,)

v.)

Civil Action No. 2:10-cv-01438-DSC

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

MOTION TO EXTEND DEADLINE FOR DISCOVERY

Plaintiffs, Elizabeth Mort and Alex Rodriguez (“Plaintiffs”) by their undersigned counsel, hereby move to enlarge the time for discovery and to extend the close of discovery until February 20, 2012. In support thereof, the Plaintiffs aver as follows:

1. On August 3, 2011, this Court entered an Order granting Defendant Jameson Health System, Inc.’s (“Jameson”) Motion For Extension of Time To Complete Discovery, extending the deadline for the completion of discovery to November 22, 2011. *See* August 3, 2011 Order [Docket No. 43].

2. The parties are nearing completion of written discovery and are attempting to resolve certain disputes regarding such written discovery.

3. Additionally, the parties are continuing their efforts to notice and schedule the remaining depositions.

4. It is respectfully submitted that extending the deadline for the close of discovery until February 20, 2012 will permit the parties to resolve outstanding discovery issues and to schedule and complete all depositions.

5. Therefore, the Plaintiffs request an extension of time until February 20, 2012 to complete discovery and a corresponding extension to related pretrial deadlines.

6. All of the Defendants have consented to the requested extension of the deadline for discovery.¹

7. No party will be prejudiced by the requested extension.

WHEREFORE, Plaintiffs respectfully request that this Court grant this Motion and enter the Order attached hereto.

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By: /s/ Patricia L. Dodge
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¹ The CYS Defendants consent to an extension of the discovery deadline but have indicated that this does not represent consent to Plaintiffs' Motion for Leave to File Second Amended Complaint [Docket No. 51].

By: /s/ Sara J. Rose

Sara J. Rose

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within Motion to Extend Deadline for Discovery was served this 7th day of November, 2011, via the Court's electronic transmission facilities pursuant to Fed. R. Civ. P. 5(b)(3) and Local Rule 5.5 upon the following:

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