

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

ELIZABETH MORT and ALEX RODRIGUEZ,

Plaintiffs,

vs.

LAWRENCE COUNTY CHILDREN AND YOUTH SERVICES; LAWRENCE COUNTY; JANE GAJDA, Lawrence County Children and Youth Services Director; SANDY COPPER, Lawrence County Children and Youth Services Supervisor; CHRISSY MONTAGUE, Lawrence County Children and Youth Services Caseworker; and JAMESON HEALTH SYSTEM, INC.,

Defendants.

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

JUDGE DAVID S. CERCONO

*Electronically Filed*

**JURY TRIAL DEMANDED**

**MOTION TO CONTINUE CONCILIATION CONFERENCE**

AND NOW, come these defendants, LAWRENCE COUNTY CHILDREN AND YOUTH SERVICES, LAWRENCE COUNTY, JANE GAJDA, Lawrence County Children and Youth Services Director, SANDY COPPER, Lawrence County Children and Youth Services Supervisor, and CHRISSY MONTAGUE, Lawrence County Children and Youth Services Caseworker, by and through their undersigned counsel, JonesPassodelis, PLLC, and file the within Motion to Continue Conciliation Conference as follows:

1. This Honorable Court set a Conciliation Conference in this matter on December 9, 2011.
2. The Order requires that persons with authority for resolution of the case be present for the conference.
3. The claims representative who is involved in this case for the Pennsylvania Counties Risk Pool, on behalf of these defendants, is out of the office on maternity leave.

4. Her supervisor is overseeing the case in her absence. However, the supervisor has a year-end staff meeting which she must attend on December 9, 2011.

5. Inasmuch as the supervisor is located in Harrisburg, she is not able to therefore make the conference on December 9, 2011.

6. These defendants, therefore, seek to reschedule the conference in this matter.

7. I have verified the availability of the supervisor from Harrisburg on other dates in December and coordinated those dates with all other parties.

8. All appear to be available on **December 19 (anytime)** and **December 15 and 21 (in the afternoon)**.

WHEREFORE, these defendants respectfully request that this Honorable Court reschedule the matter so as to permit the appropriate person from Harrisburg to be present for the conciliation conference.

JonesPassodelis, PLLC

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LAWRENCE COUNTY CHILDREN AND YOUTH  
SERVICES, LAWRENCE COUNTY, JANE GAJDA,  
SANDY COPPER and CHRISSY MONTAGUE

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within pleading has been served upon the following parties either individually or through counsel by:

- \_\_\_\_\_ Hand-Delivery
- \_\_\_\_\_ First-Class Mail, Postage Prepaid
- \_\_\_\_\_ Certified Mail-Return Receipt Requested
- \_\_\_\_\_ Facsimile
- \_\_\_\_\_ Federal Express
- X   Electronic Service

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JonesPassodelis, PLLC

Dated November 29, 2011

s/Marie Milie Jones  
MARIE MILIE JONES, ESQUIRE  
JEFFREY COHEN, ESQUIRE

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SERVICES, LAWRENCE COUNTY and CHRISSEY  
MONTAGUE, Lawrence County Children and Youth  
Services Caseworker