

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

VALENCIA M. MCCLATCHEY,)	
)	
Plaintiff,)	
)	Civil Action No. 05-145J
v.)	
)	
THE ASSOCIATED PRESS,)	JURY TRIAL DEMANDED
)	
Defendant.)	
_____)	

JOINT MOTION FOR AN EXTENSION OF TIME

Plaintiff Valencia McClatchey, and Defendant The Associated Press, by and through their attorneys, hereby submit this Joint Motion for an Extension of Time. In support of the agreed motion, Plaintiff and Defendant state as follows.

1. On July 25, 2005, this Court entered a Case Management Order and set the following dates:

Close of Fact Discovery	December 2, 2005
Expert Reports	December 15, 2005
Responses to Expert Reports	January 13, 2006
Expert Depositions	January 31, 2006
Deadlines for Motions for Summary Judgment	February 3, 2006
Plaintiff's pretrial narrative statement	February 21, 2006
Defendant's pretrial narrative statement	March 14, 2006
Joint statement re: magistrate judge	March 28, 2005

2. Since the Court's Case Management Order, the parties have

exchanged documents and written discovery. The parties have been attempting to set deposition dates. However, due to witnesses' schedules, the parties will be unable to complete fact discovery by December 2, 2005.

3. Accordingly, the parties jointly seek a 60-day extension of time and an order setting the following revised schedule:

Close of Fact Discovery	February 1, 2006
Expert Reports	February 15, 2006
Responses to Expert Reports	March 13, 2006
Expert Depositions	March 31, 2006
Deadlines for Motions for Summary Judgment	April 3, 2006
Plaintiff's pretrial narrative statement	April 21, 2006
Defendant's pretrial narrative statement	May 15, 2006
Joint statement re: magistrate judge	May 31, 2005

WHEREFORE, Plaintiffs and Defendant respectfully request that the Court approve the 60-day extension of time and enter the revised schedule above.

Respectfully submitted,

VALENCIA MCCLATCHEY

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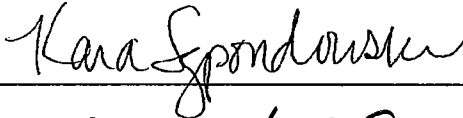
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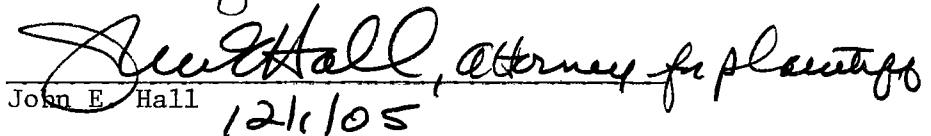
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing **JOINT MOTION FOR AN EXTENSION OF TIME** was served upon the below listed parties on this 1st day of December, 2005:

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