

**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,	)	<b>JURY TRIAL DEMANDED</b>
	)	
Defendant.	)	
_____	)	

**PLAINTIFF’S MOTION FOR EXTENSION  
OF TIME TO FILE PRETRIAL STATEMENTS**

Plaintiff Valencia McClatchey, by and through her attorneys, hereby submits this motion for extension of time to file pretrial statements. In support of the motion, Plaintiff states as follows.

1. On January 27, 2006, this Court entered a Case Management Order and set the following relevant dates:

Close of Fact Discovery	March 15, 2006
Deadlines for Motions for Summary Judgment	May 15, 2006
Plaintiff’s pretrial narrative statement	June 2, 2006
Defendant’s pretrial narrative statement	June 26, 2006
Joint statement re: magistrate judge	July 12, 2006

2. Since the Court’s Case Management Order, the parties have completed Fact and Expert Discovery. On May 15, 2006, Defendant filed a motion for summary judgment. Plaintiff is currently working on a response which is due on, or

before, June 19, 2006. Defendant's reply is due in early July. Pursuant to the current schedule, both Plaintiff and Defendant will be preparing papers regarding summary judgment at the same time period that pretrial narrative statements are due (June 2<sup>nd</sup> and June 26<sup>th</sup>, respectively).

3. Accordingly, Plaintiff seeks a short delay in the filing of the pretrial narrative statements so that the parties can concentrate on the summary judgment briefing. Plaintiff's proposed new dates are as follows:

Plaintiff's pretrial narrative statement	June 30, 2006
Defendant's pretrial narrative statement	July 24, 2006
Joint statement re: magistrate judge	July 12, 2006

A proposed order is attached.

4. Plaintiff's counsel contacted Defendant's counsel prior to filing this motion but the parties could not reach agreement on a revised schedule. Defendant's counsel agreed to a delay in the filing of the pretrial narrative statements, but wanted an indefinite delay until after the Court had ruled on the summary judgment motion. However, Plaintiff believes that only a short delay is warranted, thus placing the case in a position where it is ready to be set for trial once summary judgment is decided.

WHEREFORE, Plaintiff respectfully request that the Court grant a short delay in the filing of the pretrial narrative statements as indicated in the revised schedule above.

Respectfully submitted,

VALENCIA MCCLATCHEY

/s/Douglas M. Hall

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL STATEMENTS** was served upon the below-listed counsel of record:

**By Mail:** Gayle C. Sproul  
Levine Sullivan Koch & Schultz, LLP  
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on this 30th day of May, 2006.

/s/John E. Hall

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John E. Hall