

FILED
COURT OF CLAIMS
OF OHIO

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IN THE OHIO COURT OF CLAIMS

WILLIAM RUSSELL,)	CASE NO.: 2013-00138
)	
Plaintiff,)	
)	JUDGE PATRICK M. McGRATH
vs.)	MAGISTRATE HOLLY T. SHAVER
)	
CLEVELAND STATE UNIVERSITY,)	
)	<u>JOINT STIPULATED MOTION FOR</u>
Defendant.)	<u>EXTENSION OF DISCOVERY AND</u>
)	<u>EXPERT REPORT DEADLINES</u>

Plaintiff William Russell and Defendant Cleveland State University, jointly and respectfully move this Court to grant an extension of the Discovery and Expert Report Deadlines in this matter.

Currently, the Parties' deadline to complete discovery is February 19, 2014. Plaintiff's deadline to provide an expert report is September 20, 2013, and Defendant's deadline to provide an expert report is October 31, 2013. The Parties need additional time to complete fact discovery prior to submitting their expert reports by the current deadlines.

The Parties respectfully request an extension of the Deadlines to permit discovery and the exchange of expert reports to be completed properly and in an efficient manner. This extension of time would result in the following new schedule:

Plaintiff's Expert Report	September 20, 2013	January 15, 2014
Defendant's Expert Report	October 31, 2013	March 3, 2014
Discovery	February 19, 2014	April 7, 2014
Dispositive Motions	February 19, 2014	April 7, 2014

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This Motion is not made for purposes of unnecessary delay, and no party will be prejudiced by the granting of this Motion.

Respectfully submitted,


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/s/ Amy S. Brown via email consent
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CERTIFICATE OF SERVICE

A true and accurate copy of the foregoing was served via electronic and U.S. Mail, on this 13th day of September 2013 to:

Randall W. Knutti (0022388)
Amy S. Brown (0079650)
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TPG

THORMAN PETROV GRIFFIN

September 13, 2013

Via U.S. Mail

The Ohio Judicial Center
Court of Claims of Ohio
65 South Front Street
Third Floor
Columbus, OH 43215

Re: *Russell v. Cleveland State University*
Case No.: 2013-00139

Dear Sir/Madam:

I enclose the original and two copies of the *Joint Stipulated Motion for Extension of Discovery and Expert Report Deadlines*. The original is for filing with the Clerk and the two other copies we would like to have time-stamped. Please return the time-stamped copies to me in the enclosed self-addressed postage-prepaid envelope. *JMS*

Thank you for your attention to this matter. Please do not hesitate to call me should you have any questions.

Sincerely,



Margaret Brafchak
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Enclosures

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