

ORIGINAL

FILED  
COURT OF CLAIMS  
OF OHIO

IN THE OHIO COURT OF CLAIMS

2014 MAR 12 AM 10:51

STEVEN LISS,	)	CASE NO.: 2013-00139
	)	
Plaintiff,	)	
	)	JUDGE PATRICK M. McGRATH
vs.	)	MAGISTRATE HOLLY T. SHAVER
	)	
CLEVELAND STATE UNIVERSITY,	)	
	)	<b><u>JOINT MOTION FOR 90-DAY</u></b>
Defendant.	)	<b><u>EXTENSION OF TIME</u></b>
	)	
	)	
	)	
	)	

The parties move this Court for an extension of time of ninety (90) days for all deadlines. The parties have been working to schedule depositions and complete written discovery, but require more time to do so. The parties therefore respectfully requests that the Court extend the following deadlines by ninety (90) days, so that the parties have sufficient time to work through their discovery issues and then take depositions in an orderly fashion.

Accordingly, the parties request that the Court extend the below case deadlines ninety (90) days as follows:

<b>Event</b>	<b>Current Date</b>	<b>Proposed Date</b>
<b>Non-Expert Discovery Cut-off</b>	March 24, 2014	June 23, 2014
<b>Dispositive Motions Due</b>	March 24, 2014	June 23, 2014

The parties further request that the Pretrial and Trial also be continued ninety (90) days to a date and time convenient to this Court.

The parties do not make this request for any improper purpose or undue delay. No need for further extensions is anticipated. This is the second request for an extension that has been made.

ON COMPUTER

Respectfully submitted,

/s/Emily M. Simmons (per email consent)

RANDALL W. KNUTTI (0022388)

AMY S. BROWN (0079650)

EMILY M. SIMMONS (0082519)

Assistant Attorneys General

Ohio Attorney General's Office

Court of Claims Defense Section

150 East Gay Street, 18<sup>th</sup> Fl.

Columbus, Ohio 43215

Randall.Knutti@OhioAttorneyGeneral.gov

Amy.Brown@OhioAttorneyGeneral.gov

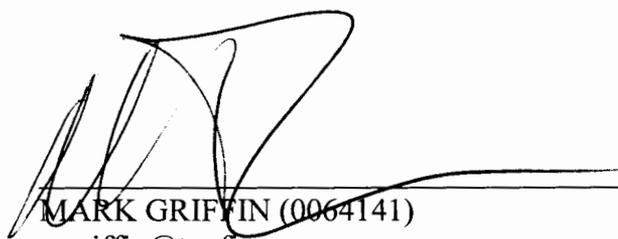
Emily.Simmons@OhioAttorneyGeneral.gov

Tel. (614) 466-7447

Fax (614) 644-9185

*Attorneys for Defendant*

*Cleveland State University*



MARK GRIFFIN (0064141)

mgriffin@tpgfirm.com

SARA W. VERESPEJ (0085511)

sverespej@tpgfirm.com

THORMAN PETROV GRIFFIN CO., LPA

3100 Terminal Tower

50 Public Square

Cleveland, Ohio 44113

Tel. (216) 621-3500

Fax (216) 621-3422

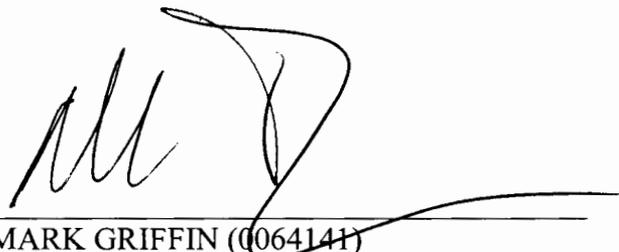
*Attorneys for Plaintiff William Russell*

**CERTIFICATE OF SERVICE**

A true and accurate copy of the foregoing was served via electronic and U.S. Mail, on  
this \_\_\_ day of March 2014 to:

Randall W. Knutti, Esq.  
Amy S. Brown, Esq.  
Emily M. Simmons, Esq.  
Ohio Attorney General's Office  
Court of Claims Defense Section  
150 East Gay Street, Floor 18  
Columbus, OH 43215  
[Randall.Knutti@OhioAttorneyGeneral.gov](mailto:Randall.Knutti@OhioAttorneyGeneral.gov)  
[Amy.Brown@OhioAttorneyGeneral.gov](mailto:Amy.Brown@OhioAttorneyGeneral.gov)  
[Emily.Simmons@OhioAttorneyGeneral.gov](mailto:Emily.Simmons@OhioAttorneyGeneral.gov)

*Attorneys for Defendant*



MARK GRIFFIN (0064141)  
[mgriffin@tpgfirm.com](mailto:mgriffin@tpgfirm.com)  
SARA W. VERESPEJ (0085511)  
[sverespej@tpgfirm.com](mailto:sverespej@tpgfirm.com)

THORMAN PETROV GRIFFIN CO., LPA  
3100 Terminal Tower  
50 Public Square  
Cleveland, Ohio 44113  
Tel. (216) 621-3500  
Fax (216) 621-3422

*Attorneys for Plaintiff Steven Liss*