

IN THE OHIO COURT OF CLAIMS

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WILLIAM RUSSELL,)	CASE NO.: 2013-00138
)	
Plaintiff,)	
)	JUDGE PATRICK M. McGRATH
vs.)	MAGISTRATE HOLLY T. SHAVER
)	
CLEVELAND STATE UNIVERSITY,)	
)	<u>JOINT MOTION FOR 90-DAY</u>
Defendant.)	<u>EXTENSION OF TIME</u>
)	
)	
)	
)	

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:

Event	Current Date	Proposed Date
Non-Expert Discovery Cut-off	March 24, 2014	June 23, 2014
Dispositive Motions Due	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.

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, 18th 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

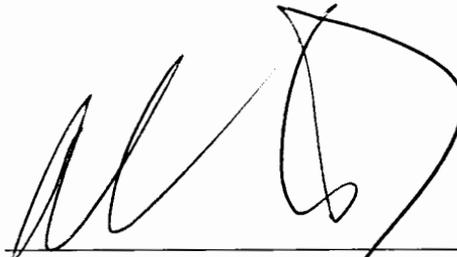
Attorneys for Plaintiff William Russell

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
Amy.Brown@OhioAttorneyGeneral.gov
Emily.Simmons@OhioAttorneyGeneral.gov

Attorneys for Defendant



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