

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

IN THE OHIO COURT OF CLAIMS

WILLIAM RUSSELL

Plaintiff

v.

CLEVELAND STATE UNIVERSITY

Defendant

Case No. 2013-00138
2014 SEP -5 PM 4:02

Judge Patrick M. McGrath
Magistrate Holly T. Shaver

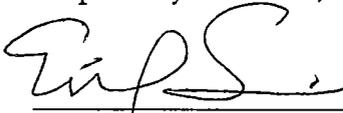
JOINT MOTION FOR EXTENSION
OF TIME AND MOTION TO
CONSOLIDATE TRIALS

The parties have been working to complete discovery, but due to witnesses' availability, we have had to schedule a few depositions after the previously-set discovery deadline of September 5, 2014. Most notably, T.W. Cauthen, the consultant who reviewed the Department prior to the reorganization is scheduled to be deposed in Athens, GA on September 12, 2014 and former Dean of the Department of Student Life, Jim Drnek, is being deposed in Bakersfield, CA on September 25, 2014. Therefore, the parties respectfully move this Court for an extension of time to conduct discovery until September 25, 2014. Additionally, the parties request an extension of time to file dispositive motions until September 29, 2014 in light of the extended discovery. This request is made in good faith and not for the purpose of delay.

The parties also jointly move this Court to consolidate this case with the *Liss v CSU*, Court of Claims Case No. 2013-00139 for purposes of trial. The parties propose the cases be tried during the week of November 3-7, 2014, when *Liss v CSU* is scheduled to proceed to trial, however this should not provide ample time to review and rule on dispositive motions, the parties propose moving the trial to the week of December 8-12, 2014. The parties believe five days is sufficient time for the consolidated trial.

ON COMPUTER

Respectfully submitted,



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CERTIFICATE OF SERVICE

On September 5, 2014, I mailed a copy of this document via regular U.S. Mail to:

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