

O'Grady

IN THE FRANKLIN COUNTY MUNICIPAL COURT
CIVIL DIVISION

FILED

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VERONICA WAGNER COVATCH,
et al.,

Plaintiffs,

Case No. 2014-CVF-024571

FRANKLIN COUNTY
MUNICIPAL COURT
LORI M. TYACK

v.

JUDGE O'GRADY

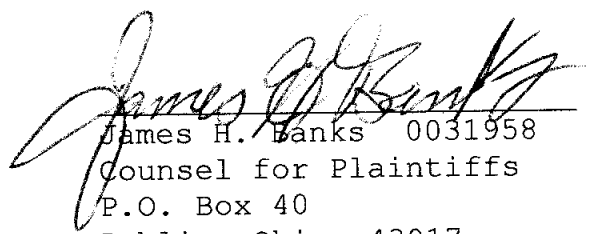
CENTRAL OHIO SHELTYE RESCUE,
Inc., et al.,

Defendants.

MOTION FOR ENLARGEMENT
OF TIME with rendered Entry

Now come plaintiffs, by and through counsel, and move this Court for an enlargement of time of one week in which to respond to the Motion for Protective Order filed by defendants COSR and Penny Sanderbeck for good cause, as set forth in the accompanying Memorandum in Support attached hereto and incorporated herein as if fully rewritten.

Respectfully submitted,



James H. Banks 0031958
Counsel for Plaintiffs
P.O. Box 40
Dublin, Ohio 43017
Tel. (614) 866-0666
Fax. (614) 389-3880

MEMORANDUM IN SUPPORT

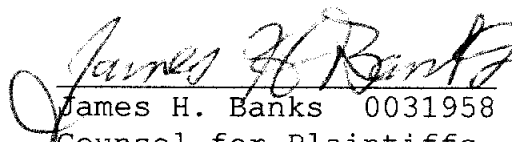
Moving defendants served their instant motion on March 12, 2015. Due to the serious nature of the allegations made by defendants in their motion, the undersigned is in the process of obtaining affidavits from the plaintiffs, one of whom lives in Pennsylvania and the other in Norwalk, Ohio. Other possible affiants reside in various cities throughout the United States. Accordingly, additional time is necessary to obtain affidavits necessary and essential to adequate response to defendants' motion.

No party will be prejudiced should this request for enlargement of time be granted; rather, justice requires that plaintiffs be granted sufficient time in which to adequately respond to defendants' motion for protective order.

Accordingly, in the interest of justice, this Court should grant plaintiffs an enlargement of time of at least one week in which to respond to defendants' COSR and Penny Sanderbeck's Motion for Protective Order.

By his signature below the undersigned affirms that the facts set forth herein are true.

Respectfully submitted,


James H. Banks 0031958

Counsel for Plaintiffs

P.O. Box 40

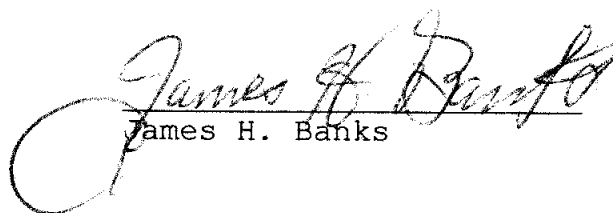
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was duly served upon John A. Bell, Esq., P.O. Box 091022, Bexley, Ohio 43209 and Scott O. Sheets, Assistant Prosecuting Attorney, 373 South High Street, 13th Floor, Columbus, Ohio 43215, via ordinary U.S. Mail, postage prepaid, this 26th day of March, 2015.


James H. Banks