

O'Grady

IN THE FRANKLIN COUNTY MUNICIPAL COURT
CIVIL DIVISION
FRANKLIN COUNTY, OHIO

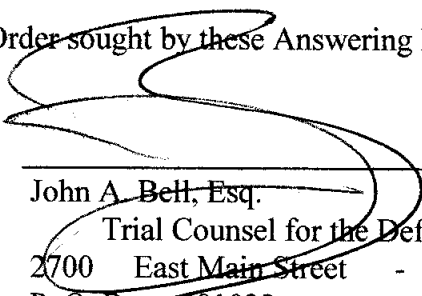
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FRANKLIN COUNTY
MUNICIPAL COURT
LOUISIANA TRACK

Veronica Wagner Covatch, *et al.*, :
Plaintiffs : CASE NO.: 2014-CVF-024571
-vs.- : Judge: O'Grady
Central Ohio Sheltie Rescue, Inc., *et al.*, :
Defendants :

**MEMORANDUM IN OPPOSITION TO MOTION FOR ENLARGEMENT OF TIME
(TO RESPOND TO MOTION FOR PROTECTIVE ORDER)**

Now come the Defendants in the above-captioned action, Central Ohio Sheltie Rescue, Inc., hereinafter referred to individually as, "Defendant COSR," and Penny Sanderbeck, hereinafter referred to individually as, "Defendant Sanderbeck," collectively hereinafter referred to as, "these Answering Defendants," and by and through their undersigned attorney, they offer the following Memorandum In Opposition to the Motion filed March 26, 2015, by the attorney for the Plaintiffs in this action, seeking an Order to grant them additional time to respond to these Answering Defendants' Motion for an Order governing discovery in this action. For the reasons and authorities contained in the following Memorandum, the Plaintiffs' Motion for Enlargement of Time should be denied and the Court should grant the Protective Order sought by these Answering Defendants..

Respectfully submitted,



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MEMORANDUM IN SUPPORT

The Plaintiffs seek additional time to respond to the Motion for Protective Order which was filed and served on March 12, 2015. The Plaintiffs submitted their latest Motion for enlargement fourteen (14) days after being served with the Motion for Protective Order. In support of the Motion for enlargement, the Plaintiffs' counsel avers that the additional time is needed to obtain affidavits from "other possible affiants [who] reside in various cities throughout the United States."


It should be noted that the Defendants' Motion for Protective Order concerns only the conduct of the Plaintiffs and their attorneys. Therefore, the affidavits referenced in the Motion for Enlargement of Time could not have any bearing on the Motion for Protective Order. The only basis for the Motion for Enlargement of Time is the alleged need for time to obtain these affidavits, and those affidavits would be irrelevant to the issues in the Protective Order. Thus, there is no reason for the Court to delay this action any further, and the Motion for Enlargement of Time should be denied.

Further, the Plaintiffs were already granted one (1) enlargement of time to respond to these Answering Defendants' initial discovery requests. These Answering Defendants will provide the Court with copies of the evasive and incomplete "answers" submitted by the Plaintiffs following that enlargement of time, which will establish that the Plaintiffs' requests for additional time serve no legitimate purpose other than to unduly delay the prosecution of this action.

Finally, since the Motion for Protective Order filed by these Answering Defendants seeks *only* to prohibit the parties and their attorneys from publication of discovery responses, any opposition by the Plaintiffs to the Motion for Protective Order must be interpreted to mean that the Plaintiffs and their attorneys want to publish discovery responses. That action can only annoy and harass the people identified in those discovery responses, and can serve no legitimate purpose.

For these reasons, the Motion for Enlargement of Time should be denied, and the requested Protective Order should be granted.

Respectfully submitted,

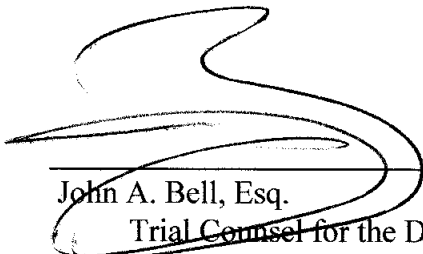


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CERTIFICATE OF SERVICE

I hereby certify that on this second (2nd) day of April 2015, I have served a true copy of the foregoing MEMORANDUM IN OPPOSITION TO MOTION FOR ENLARGEMENT OF TIME (TO RESPOND TO MOTION FOR PROTECTIVE ORDER) upon counsel for the Plaintiffs by hand delivery, or by placing it in regular U.S. Mail, first class postage fully prepaid, addressed to:

Mr. James H. Banks, Esq., and
Ms. Nina M. Najjar, Esq.,
P. O. Box 40
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