



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY,
PENNSYLVANIA
CIVIL ACTION – LAW

GRAHAM B. SPANIER,

Plaintiff,

v.

LOUIS J. FREEH and FREEH SPORKIN
& SULLIVAN, LLP,

Defendants.

Docket No. 2013-2707

DEAN C. IMBEL
PROthonARY
CENTRE COUNTY, PA

2017 MAR 31 PM 2:02

FILED FOR RECORD

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants Louis J. Freeh and Freeh Sporkin & Sullivan, LLP hereby move for a brief extension of time in which to file their response to Plaintiff's Second Amended Complaint, and in support thereof aver as follows:

1. Plaintiff Graham B. Spanier filed a Second Amended Complaint on March 17, 2017.
2. The Order entered by the Court on Defendants' Preliminary Objections to Plaintiff's Amended Complaint provides that Defendants' response to the Second Amended Complaint "shall be logged within the timeframe provided by law."
3. Defendants' response therefore is due on April 6, 2017.

ORIGINAL

4. On March 24, 2017, Plaintiff was convicted of one count of endangering the welfare of children following a jury trial.

5. Defendants presently are considering the legal consequences, if any, of that conviction on this action, and, accordingly, request an extension of time to complete that analysis.

6. Counsel for Defendants has conferred with counsel for Plaintiff, and counsel for Plaintiff does not oppose Defendants' request.

WHEREFORE, Defendants respectfully request that this Court grant a brief extension of time until May 8, 2017 for Defendants to file their response to Plaintiff's Second Amended Complaint.

Respectfully submitted,



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*Attorneys for Defendants Louis J. Freeh
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CERTIFICATE OF SERVICE

I, David S. Gaines, Jr., hereby certify that I caused to be served on March 3-, 2017, a true and correct copy of the foregoing by first-class mail upon the following:

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