



GRAHAM B. SPANIER,

Plaintiff,

v.

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

Defendants.

: COURT OF COMMON PLEAS
: OF CENTRE COUNTY

: No. 2013-2707

2017 MAR 23 PM 4:33

FILED

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS' NEW MATTER**

Plaintiff Graham B. Spanier, by counsel, hereby moves this Court for an extension of time to June 6, 2017 for Dr. Spanier to respond to the New Matter included with the Answer to the Second Amended Complaint filed by Defendants Louis J. Freeh and Freeh Sporkin & Sullivan, LLP.

1. Plaintiff filed a Second Amended Complaint on March 17, 2017.
2. On May 8, 2017, Defendants filed their Answer to the Second Amended Complaint.
3. The Defendants' Answer includes more than 150 affirmative factual allegations as New Matter that Dr. Spanier is required to respond to after conducting the requisite investigations to determine the veracity of the allegations.

4. Dr. Spanier's response to Defendants' New Matter is currently due on May 30, 2017.

5. In order to fully investigate the factual bases for Defendants' New Matter allegations, and so that Dr. Spanier can properly admit or deny those allegations as necessary, Dr. Spanier requests a brief extension of one week for his response.

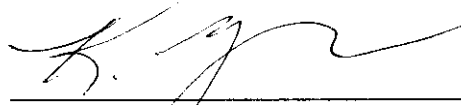
6. As the Court may recall, on March 30, 2017, Dr. Spanier agreed to Defendants' request for a month's long extension to file their response to the Second Amended Complaint, which request was subsequently granted by the Court.

7. Defendants do not oppose to Dr. Spanier's request for an extension of one week to June 6, 2017 for Dr. Spanier respond to the New Matter included with Defendants' Answer to the Second Amended Complaint.

WHEREFORE, Plaintiff Graham B. Spanier, by counsel, requests that this Court enter the attached proposed order granting Dr. Spanier an extension of time through June 6, 2017, to respond to Defendants' New Matter.

Dated: May 23, 2017

By:



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the below counsel of record via U.S. regular mail, postage prepaid, on May 23, 2017.

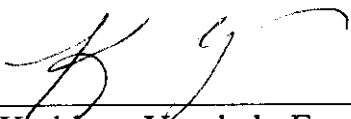
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