UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

JOHN DOE AND JANE DOE, as the Natural Parents and Next Friends of Their Minor Child, JAMES DOE, Plaintiffs, vs. MOUNT VERNON CITY SCHOOL DISTRICT BOARD OF EDUCATION, ET AL., Defendants.	)))))))))))))	CASE NO.: 2:08 CV 575 JUDGE GREGORY FROST **<u>MOTION FOR ENLARGEMENT OF TIME WITHIN WHICH TO MOVE OR PLEAD TO AMENDED COMPLAINT</u>**

Now comes Defendant, John Freshwater, by and through counsel, and hereby moves this Honorable Court pursuant to Fed.R.Civ.P. 6(b) for an enlargement of time of twenty (20) days from August 12, 2008, within which to move, plead, or otherwise respond to Plaintiffs' Amended Complaint. Counsel for said Defendant has only recently been retained and further states that it is necessary to meet with the Defendant in order to properly prepare a response to Plaintiffs' Amended Complaint. Defendant has previously been granted no enlargements of time for a total of – 0 – days.

In view of the foregoing, Defendant, John Freshwater, respectfully requests that this Honorable Court grant them an extension of time of twenty (20) days through and including September 2, 2008, within which to move or plead to Plaintiffs' Amended Complaint. Counsel for Plaintiffs, was contacted on August 11, 2008 and has no objections to said extension.

Respectfully submitted,

MAZANEC, RASKIN, RYDER & KELLER CO., L.P.A.

s/Robert H. Stoffers
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Counsel for Defendant John Freshwater

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2008, a copy of the foregoing Motion for Enlargement of Time Within Which to Move or Plead to Amended Complaint was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Robert H. Stoffers
ROBERT H. STOFFERS (0024419)

Counsel for Defendant John Freshwater

OCG-08C053/Leave to Plead