

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CLIFTON A. JACKSON, et al. :  
Plaintiffs, : Case No. 2:17-cv-163  
vs. : CHIEF JUDGE SARGUS  
OHIO STATE HIGHWAY PATROL, et al., : MAGISTRATE JUDGE JOLSON  
Defendants. :

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MOTION FOR EXTENSION OF TIME

Now comes the Plaintiffs and moves this Honorable Court for a 60-day extension of time, until April 24, 2017, to respond to Defendant United States of America's Motion to Dismiss for Lack of Subject Matter Jurisdiction.

The reasons for this motion are more particularly contained in the attached Memorandum in Support.

Respectfully submitted,

Clifton A. Jackson

Clifton A. Jackson, et al.  
#A652-163  
Lake Erie Correctional Inst.  
501 Thompson Road  
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Conneaut, Ohio 44030

PLAINTIFF(S)

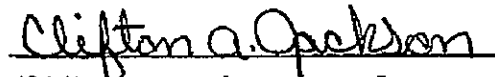
MEMORANDUM IN SUPPORT

Plaintiffs asserts that, "Federal Defendants former DEA Task Force Officer Geno Taliano and former Special Agent Caitlin Szczepinski" received the state court complaint filed by Plaintiffs on February 6, 2017 in the Franklin County Court of Common Pleas, State of Ohio, which was assigned Civil Case No. 20-17-CV-616. Compl., ECF No. 1-1, ¶ 31. Plaintiffs seek compensatory, punitive, and monetary damages in excess of \$58 million. Id. at p. 14.

The United States Attorney for the Southern District of Ohio, Benjamin C. Glassman, certified that TFO Taliano and SA Szczepinski were acting within the scope of their employment with the United States Government at the time of the incident out of which Plaintiffs' claim arose. On February 24, 2017, the United States of America removed the action from the Franklin County Common Pleas Court to this Court. Notice of Removal, ECF No. 1. On that same day, The United States substituted itself for TFO Taliano and SA Szczepinski as to Plaintiffs' Civil Action. Notice of Substitution, ECF No. 2. The United States subsequently moved to dismiss Plaintiffs' Civil Action Claims under Federal Rule of Civil Procedure 12(b)(1). Mot. to Dismiss, ECF No. 3.

Plaintiffs pursuant to Fed.Civ.R. 6 requests a 60-day extension of time to response to Federal Defendants' motion to dismiss filed on February 24, 2017, and this is Plaintiff's first request for an extension, and this request does not prejudice the Federal Defendants.

Respectfully submitted,



Clifton A. Jackson, et al.  
#A652-163

Plaintiff(s)

**CERTIFICATE OF SERVICE**

Plaintiffs certify that a copy of the foregoing Motion for Extension of Time was sent by regular U.S. Mail to the United States Attorney, Benjamin C. Glassman, counsel for Federal Defendants former DEA Task Force Officer Geno Taliano and former Special Agent Caitlin Szczepinski, at 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215 on this 7th day of March, 2017.

*Clifton A. Jackson*

PLAINTIFF(S)