

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

CLIFTON A. JACKSON, et al.,	:	CASE NO. 2:17-cv-163
	:	
Plaintiff,	:	CHIEF JUDGE SARGUS
v.	:	MAGISTRATE JUDGE JOLSON
	:	
OHIO STATE HIGHWAY PATROL, et al.,	:	
	:	
Defendants.	:	

**MOTION FOR EXTENSION OF TIME**

Come now the Defendants, Dennis P Will, Mary Slanczka, Jennifer Reidthaler, Peter J Gauthier, Laura Ann Dezort, the Honorable Edward Zaleski and the Honorable John P Miraldi (collectively "County Defendants"), by and through statutory counsel and respectfully requests that this Honorable Court grant them an additional twenty one (21) days leave to move, plead or otherwise defend this action. As noted in the Motion for Extension of Time filed in this matter by the US Attorney, S.D. Ohio Civ. R. 7.3 is not applicable in this matter given the status of Mr. Jackson, the primary plaintiff and lone signatory to the Complaint, who is a prisoner proceeding *pro se*.

As grounds for this motion, the County Defendants state that a responsive pleading to the Complaint would be due by rule on March 6, 2017. This does not provide adequate time for the County Defendants to prepare a comprehensive response to the claims made by the Plaintiffs. There are a number of County Defendants, several of whom are no longer employed by the County, and coordination is proving time consuming. Given the number of County Defendants,

and the nature and scope of the claims brought by the Plaintiffs, the County Defendants submit that a twenty one (21) day extension of time until March 27, 2017 to move, plead or otherwise defend this action is warranted and appropriate.

Respectfully submitted,

DENNIS P. WILL  
Prosecuting Attorney

s/Daniel F. Petticord

s/Chris A. Pyanowski

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CERTIFICATE OF SERVICE

I certify that on March 2<sup>nd</sup>, 2017, I filed the foregoing Motion for Extension of Time using the Court's CM/ECF system and I certify that on the same day a copy of the foregoing was sent via regular U.S. Mail to:

Clifton A. Jackson  
Lake Erie Correctional Institution, # A652-163  
501 Thompson Road  
Conneaut, OH 44030

[REDACTED]  
[REDACTED]  
Buffalo, NY [REDACTED]

Amber Powlak  
[REDACTED]  
Buffalo, NY [REDACTED]

Mason Jackson  
[REDACTED]  
Buffalo, NY [REDACTED]

Moneh Fuller  
[REDACTED]  
Buffalo, NY [REDACTED]

Roman Motley  
[REDACTED]  
Buffalo, NY [REDACTED]

Elijah Fuller  
[REDACTED]  
Buffalo, NY [REDACTED]

Lorrionna Jackson  
[REDACTED]  
Buffalo, NY [REDACTED]

April Burns  
[REDACTED]  
Detroit, MI [REDACTED]  
Angel Burns Myles  
[REDACTED]  
Detroit, MI [REDACTED]

Brenda Jackson

[REDACTED]  
Detroit, MI [REDACTED]

Jamel Pittman

[REDACTED]  
Detroit, MI [REDACTED]

Ohio State Highway Patrol  
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P.O. Box 182074  
Columbus, OH 43218-2074

State Trooper, Christopher Beyer  
1970 W. Broad Street  
P.O. Box 182074  
Columbus, OH 43218-2074

State Trooper, Michael Trader  
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