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**IN THE COURT OF COMMON PLEAS,  
ADAMS COUNTY, OHIO  
GENERAL DIVISION**

<b>SHAWN D. COOLEY, et al.,</b>	:	Case No. 2023-0069
Plaintiffs,	:	
v.	:	Judge Jerry McBride
	:	
<b>JOSEPH EDGAR FOREMAN,</b>	:	
<b>A/K/A AFROMAN, et al.</b>	:	
Defendants.	:	

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY  
IN SUPPORT OF MOTION FOR JUDGMENT ON THE PLEADINGS**

Now come Plaintiffs, Shawn D. Cooley, Justin Cooley, Michael D. Estep, Shawn S. Grooms, Brian Newland, Lisa Phillips, and Randolph L. Walters, Jr. ("Plaintiffs"), by and through counsel, and hereby respectfully request a brief extension until July 8, 2024 to file the reply brief in support of their pending motion for judgment on the pleadings. Reasons accompanying this request are more fully set forth in the attached memorandum in support.

Respectfully submitted,

/s/ David Moser

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*Counsel for Plaintiffs as to Counterclaims*

**MEMORANDUM IN SUPPORT**

Plaintiffs seek a short extension to file their reply brief in support of their pending motion for judgment on the pleadings until on or before Monday, July 8, 2024. Given the approaching July 4 holiday and staff schedules for the undersigned legal counsel, this brief extension will help Plaintiffs finalize their response to Defendants' recently filed opposition brief and fully brief all pending issues on the motion before this Court. Defendants' legal counsel has been contacted and indicated no objection to the instant request for an extension. An order/entry accepting this extension has been enclosed herewith.

For the foregoing reasons, Plaintiffs respectfully seek an extension to file a reply in support of the motion for judgment on the pleadings until Monday, July 8, 2024.

Respectfully submitted,

/s/ David Moser

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**CERTIFICATE OF SERVICE**

This certifies that a true and accurate copy of the foregoing was served by email, this 1<sup>st</sup> day of July, 2024, upon the following:

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