

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

(1) KENNETH BUCKLEY, on behalf of D.D.B.,)
a minor child, (2) PHILLIP and ANDREA)
CONNELLY, on behalf of E.J.D.C., a minor child,)
(3) CLINT and CATHY STAPLETON, on behalf of)
K.N.S., a minor child, (4) BOBBY and RUTH)
SWEET, on behalf of M.N.S., a minor child,)
(5) MICHELLE SUMTER, on behalf of M.N.S.,)
a minor child, (6) FRANCIS SHOEMAKER,)
on behalf of D.W.S.)
Plaintiffs.)

Case No. 10-CV-240 GKF PJC

v.)

(1) INDEPENDENT SCHOOL DISTRICT NO. 4)
of ROGERS COUNTY, OKLAHOMA a/k/a)
OOLOGAH TALALA PUBLIC SCHOOLS,)
(2) CARA JONES, individually, (3) MELISSA)
GIBSON, individually, (4) KENNETH KINZER,)
Individually, (5) RICK THOMAS, individually,)
(6) BOBBY SORDO, individually, (7) CITY OF)
OWASSO , a political subdivision,)
jointly and severally,)
Defendants.)

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

COME NOW the Plaintiffs Kenneth Buckley, on behalf of D.D.B., a minor child,
Phillip and Andrea Connelly on behalf of E.J.D.C., a minor child, Clint and Cathy
Stapleton, on behalf of K.N.S., a minor child, Bobby and Ruth Sweet, on behalf of
M.N.S., a minor child, and Michelle Sumter, on behalf of M.N.S., a minor child, and
Frances Shoemaker, on behalf of D.W.S. and hereby submit their Motion for Extension
of Time. In support thereof, Plaintiffs allege and state as follows:

1. Defendant Sordo filed his Motion to Dismiss (Doc. No. 27) on May 17,
2010 and pursuant to the expediated scheduling order, the responses were due May 27,
2010.

2. That Plaintiffs filed their Response and Objection to the School District Defendants' last night and by the time it was entered, it was past midnight so Plaintiffs' counsel decided to ask for leave to file the response.

3. That Fed. R. Civ. P. 6 allows for the court to extend time beyond the prescribed time. See also Fed. R. Civ. P. 1.

4. That in the instant case, counsel for Plaintiffs was responding to the School Defendants motion for summary judgment and it was a lengthy process 4.

5. That based on the above, good cause exists. Further, allowing this relief would be "just" under Fed. R. Civ. P. 1.

6. Counsel for School District Defendants has no position to this request and Counsel for Officer Sordo objects to the one day extension, however, Office Sordo has still not provided his initial disclosures which are now over one week due. The response is ready to be filed and Counsel for Plaintiffs stands ready to file the response as soon as receiving this Court's permission.

WHEREFORE, for all of the foregoing reasons, Plaintiffs respectfully request that they be allowed to file their response today and any other and further relief this Court deems proper.

s/ Brendan M. McHugh
Brendan M. McHugh, OBA #18422
Attorney for Plaintiff
P.O. Box 1392
Claremore, OK 74018
(918) 343-1773
Fax: (918) 343-1725

CERTIFICATE OF ELECTRONIC FILING

This is to certify that a correct copy of the above document has been sent via the Court's ECF notification system this 28th day of May 2010 to:

Keith A. Wilkes, OBA #16750

Gregory P. Reilly, OBA #22284
Newton, O'Connor, Turner & Ketchum, P.C.
15 W. Sixth St., Ste. 2700
Tulsa, OK 74119-5423
(918) 587-0101
Fax: (918) 587-0102
kwilkes@newtonoconnor.com
greilly@newtonoconnor.com
Attorneys for Defendants Bobby Sordo and City of Owasso

J. Douglas Mann, OBA #5663
Eric D. Wade, OBA #19249
Matthew J. Ballard, OBA #19400
Rosenstein, Fist & Ringold
525 S. Main, Ste. 700
Tulsa, OK 74103
(918) 585-9211
Fax: (918) 585-5617
dougm@rfrlwa.com
ericw@rfrlaw.com
mballard@rfrlaw.com
Attorneys for School Defendants

s/ Brendan M. McHugh
Brendan M. McHugh