

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

JAN 24 2005

JAMES W. McCORMACK, CLERK  
By: \_\_\_\_\_ DEP. CLERK

MICHAEL GALSTER,

PLAINTIFF

VS.

CASE NO.: 4:03CV01013 GTE

KELLY DUDA,

DEFENDANT

JOINT MOTION TO EXTEND DISCOVERY DEADLINE AND  
TO ENLARGE TIME TO RESPONSE TO DEFENDANT'S DISCOVERY

Comes now the Parties by and through their respective counsel and would state to the court the following:

1. That Defendant has agreed to enlarge the time to respond to discovery, including Requests for Admissions, until February 3, 2005.
2. That the Parties jointly agree to extend the discovery completion deadline until February 28, 2005 in order to conduct any party or witness depositions once written discovery has been completed.
3. That neither the enlargement or extension of time are for the purpose of delay, harassment or vexatious purposes.

WHEREFORE, the Parties pray that their Joint Motion be granted and for all other just and proper relief.

By: \_\_\_\_\_

Robert R. Cortinez II  
Attorney for Defendant  
P.O. Box 217  
Little Rock, AR 72203  
501-372-6000

CERTIFICATE OF SERVICE

I, Robert R. Cortinez II, do hereby state that on this 24<sup>th</sup> day of January, 2005, a copy of the foregoing pleading was furnished, via US Mail, postage prepaid, upon the following:

Mr. Joseph Walker Woodson, Jr.  
**Via Fax No.: 376-6938**  
Whetstone Law Firm  
Regions Center  
400 West Capitol, Suite 2990  
Little Rock, AR 72201



Robert R. Cortinez II