

**IN THE COURT OF COMMON PLEAS  
RICHLAND COUNTY, OHIO**

<b>CITY OF MANSFIELD</b>	)	<b>CASE NO. 2024-CV-0206</b>
	)	
<b>Plaintiff,</b>	)	<b>JUDGE CHRISTOPHER COLLIER</b>
	)	<b>(VISITING JUDGE)</b>
<b>vs.</b>	)	
	)	
<b>PAGE EXCAVATING LLC, et al.</b>	)	<b><u>JOINT MOTION TO</u></b>
	)	<b><u>EXTEND DEADLINES</u></b>
<b>Defendants.</b>	)	
	)	
	)	
	)	
	)	
	)	

NOW COME the parties, by and through counsel, and hereby request that the deadlines for the conclusion of discovery, experts, trial, etc., set forth in the Court’s previous Trial Order of November 7, 2024, be vacated and new dates put in place. The reason for this request is that the parties have encountered some difficulty with regard to document retrieval and witness availability in the course of discovery. Additional time is needed in order to fully evaluate the case and also to prepare it for trial. The parties met and conferred on May 29, 2025, and are working together to try to move discovery forward in the most expeditious manner possible. No previous requests for extension have been made. We would recommend that the dates be extended as follows:

- Jury Trial – March 16, 2026, at 9:00 am;
- Discovery Cutoff – December 12, 2025;
- Plaintiff’s Expert Reports – October 31, 2025;
- Defense Expert Reports – November 30, 2025;
- Dispositive Motion Cutoff – January 30, 2026;
- Trial Briefs – February 15, 2026.

Respectfully submitted,

s/Mel L. Lute, Jr.

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