

PHILIP GODLEWSKI,
Plaintiff

v.

CHRIS KELLY, et al.
Defendants.

: IN THE COURT OF COMMON PLEAS
: OF LACKAWANNA COUNTY
: MAINTENANCE KELLY
: LACKAWANNA COUNTY
: CIVIL DIVISION 2023 JUN 28 P 3:49
: JURY TRIAL DEMANDED
: REQUIRES JUDICIAL
: RECORDS CIVIL DIVISION
: No.: 2021-CV-2195

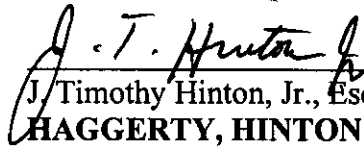
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MOTION TO REQUEST A CASE MANAGEMENT CONFERENCE

Defendants, Chris Kelly, The Scranton Times, L.P., and Larry Holeva (collectively “Defendants”), by and through their counsel, J. Timothy Hinton, Jr. and Haggerty Hinton & Cosgrove LLP, hereby file this Motion to Request a Case Management Conference.

1. This case was initiated by the filing of a Complaint on May 24, 2021.
2. The pleadings in this case have been closed since July 6, 2021.
3. Extensive written discovery has taken place during the last 2 years.
4. Defendants’ counsel recorded four (4) depositions in early 2023.
5. Defendants’ counsel has scheduled four (4) additional depositions to take place in the next 5 weeks.
6. Plaintiff has not scheduled any depositions.
7. Defendants will be filing a motion for summary judgment at the conclusion of discovery.
8. Defendants request that discovery be closed by August 31, 2023, except for any supplemental responses to written discovery responses, so that dispositive motions may be filed in this case.
9. Defendants suggest a deadline for the filing of any motions for summary judgment be set as September 30, 2023 and responses thereto be filed within thirty (30) days thereafter.

WHEREFORE, Defendants respectfully request that this Court schedule a Case Management Conference to establish case management deadlines.

Respectfully submitted,



J. Timothy Hinton, Jr., Esq.

HAGGERTY, HINTON & COSGROVE LLP

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Dunmore, PA 18509

(570) 344-9845

Attorney for Defendants, Chris Kelly

The Scranton Times and Larry Holeva

CERTIFICATE OF COMPLIANCE

I hereby certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

MAURIE B KELLY
LACKAWANNA COUNTY
2023 JUN 28 9:49
CLERK OF JUDICIAL
RECORDS DIVISION

/s/ J. Timothy Hinton, Jr., Esq.
J. TIMOTHY HINTON, JR., ESQUIRE
PA I.D. 61981

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MAURI B KELLY
LACKAWANNA COUNTY

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CLERK OF JUDICIAL
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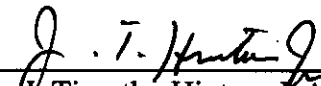
CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June 2023, I caused to be served by electronic mail, a true and correct copy of the foregoing Motion to Request a Case Management Conference upon all parties:

Timothy M. Kolman, Esq.
414 Hulmeville Ave.
Penndel, PA 19047
TKolman@kolmanlaw.com
Attorney for Plaintiff

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

By: 
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*Chris Kelly, The Scranton Times, L.P.,
and Larry Holeva*