

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Annamarie Hannay, et al.,

Plaintiffs,

v.

American Federation of State, County and
Municipal Employees, Ohio Council 8, et al.,

Defendants.

Case No. 5:19-cv-00951

Judge John R. Adams
Magistrate Judge Kathleen B. Burke

**JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' COMPLAINT AND FOR CANCELLATION OF THE
PENDING CASE MANAGEMENT CONFERENCE**

The parties hereby jointly stipulate and move as follows:

1. Plaintiffs' Complaint was filed on April 29, 2019.
2. The response to the Complaint of Defendants American Federation of State, County and Municipal Employees, Ohio Council 8 and Kent State University Employees Local 153 (Union Defendants) is currently due today, August 26, 2019.
3. The Court has scheduled a Case Management Conference in this matter for September 9, 2019.
4. The parties have engaged in extended settlement discussions and reached agreement today on terms to resolve the matter as to all parties. The parties need a short additional period to finalize and effectuate the terms of their resolution.
5. In light of their agreement to resolve the matter, the parties jointly move to extend until September 26, 2019 the period for the Union Defendants to file their response to the

Complaint, and also move that the Case Management Conference currently scheduled for September 9, 2019 be cancelled.

6. Counsel for the Kent State Defendants has been consulted and has no objection to the motion.

7. The parties have sought no prior extensions of time in this action.

Dated: August 26, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

The foregoing document has been served via the Court's ECF filing system on this 26th day of August, 2019, on all counsel of record.

s/ Richard F. Griffin, Jr.
Richard F. Griffin, Jr.*