## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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Three Angels Broadcasting Network, Inc., an Illinois non-profit corporation, and Danny Lee Shelton, individually, Plaintiffs,

Gailon Arthur Joy and Robert Pickle,

v.

Case No.: 07-40098-FDS

## DEFENDANTS' MOTION TO EXTEND ALL DEADLINES FOR DISCOVERY

Defendants.

Defendants Robert Pickle and Gailon Arthur Joy seek an extension of all deadlines for discovery by 90 days because of inordinate delays on the part of the Plaintiffs in the production of documents, and because Plaintiffs have indicated that they intend to further obstruct the Defendants' discovery efforts.

Production of documents is essential to the Defendants' preparation for depositions, and Plaintiffs' production has been non-substantive to the allegations in the complaint. Therefore, the production issues must be resolved in order for the Defendants to schedule depositions.

WHEREFORE, the Defendants pray the Court to extend all deadlines for discovery by 90 days, and for whatever further relief the Court deems fair and just.

Respectfully submitted,

Dated: June 10, 2008

<u>/s/ Gailon Arthur Joy, pro se</u> Gailon Arthur Joy, pro se Sterling, MA 01564 Tel: (978) 422-3525

and

/s/ Robert Pickle, pro se

Robert Pickle, *pro se* Halstad, MN 56548 Tel: (218) 456-2568 Fax: (206) 203-3751

## LOCAL RULE 7.1 CERTIFICATE

The undersigned hereby attests that the Defendants have complied with the requirements of Local Rule 7.1 by having, in good faith, through counsel conferred with Plaintiffs, and that this conferring resulted in all parties agreeing that a 90-day extension of all discovery deadlines was reasonable.

Dated: June 10, 2008

/s/ Bob Pickle

## **AFFIDAVIT OF SERVICE**

Under penalty of perjury, I, Bob Pickle, hereby certify that this document, with accompanying memorandum, affidavit, exhibits, and proposed order, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and by email to Gailon Arthur Joy on June 10, 2008.

Dated: June 10, 2008

/s/ Bob Pickle

Subscribed and sworn to me this 10th day of June, 2008.

<u>/s/ Deanna M. Zimmerman</u> Notary Public—Minnesota

My Commission Expires Jan. 31, 2010