
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
Three Angels Broadcasting Network, Inc.,)	
an Illinois non-profit corporation, and)	
Danny Lee Shelton, individually,)	Case No.: 07-40098-FDS
)	
) Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
) Defendants.)	
_____)	

DEFENDANTS' MOTION TO EXTEND ALL DEADLINES FOR DISCOVERY

Defendants Gailon Arthur Joy and Robert Pickle seek an extension of all deadlines for discovery and dispositive motions by 90 days due to the pending discovery-related motions in this Court, the pending appeal in the Western District of Michigan, and the pending discovery-related motion in the Southern District of Illinois, motions and an appeal that have all delayed the production of documents to the Defendants.

Plaintiffs' production thus far has been largely non-substantive to the allegations in Plaintiffs' complaint and Defendants' answer. The Defendants therefore lack the information needed to appropriately form requests for admission, interrogatories, and additional requests to produce, as well as to conduct effective depositions. Additionally, until the Court rules on the outstanding relevancy issues, the Defendants will have difficulty forming discovery requests and conducting depositions that will harmonize with the future ruling of this Court.

WHEREFORE, the Defendants pray the Court to extend all deadlines for discovery and dispositive motions by 90 days (fact discovery to be completed by 1/26/2009; dispositive motions due by 6/3/2009; requests for production of documents, interrogatories, and requests for

admissions to be served by 12/8/2008; non-expert depositions to be completed by 1/26/2009; Plaintiffs' experts to be disclosed by 2/26/2009; Defendants' experts to be disclosed by 3/29/2009; expert depositions to be completed by 4/29/2009), and for whatever further relief the Court deems fair and just.

Respectfully submitted,

Dated: September 8, 2008

/s/ Gailon Arthur Joy, pro se

Gailon Arthur Joy, *pro se*
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and

/s/ Robert Pickle, pro se

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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 Plaintiffs' counsel has represented that he opposes this motion.

Dated: September 8, 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).

Dated: September 8, 2008

/s/ Bob Pickle