

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

PATRICK C. DESMOND AND MARY)
C. DESMOND, INDIVIDUALLY, AND)
MARY C. DESMOND, AS)
ADMINISTRATRIX OF THE ESTATE)
OF PATRICK W. DESMOND,)

Civil Action No. 10A28641-2

Plaintiffs,)

v.)

NARCONON OF GEORGIA, INC.)
DELGADO DEVELOPMENT, INC.,)
SOVEREIGN PLACE, LLC, SOVEREIGN)
PLACE APARTMENT MANAGEMENT,)
INC., LISA CAROLINA ROBBINS, M.D.)
THE ROBBINS GROUP, INC., and)
NARCONON INTERNATIONAL,)

Defendants.)

MOTION TO EXTEND TIME FOR DISCOVERY

Plaintiffs and counsel for Defendants move this Court for an extension of discovery time in the above-styled action through November 25, 2011.

This is a complex wrongful death action, which will require the use of multiple experts, and additional time is needed to develop fact information.

The represented parties are in agreement that an additional period of six months to complete discovery is needed and appropriate. This is the second request for an extension of discovery in this action.

WHEREFORE, the parties jointly pray that the Court extend discovery to and through November 25, 2011 based upon the attached proposed Order.

This the 25th day of May, 2011.

HARRIS PENN LOWRY DELCAMPO, LLP



JEFFREY R. HARRIS

Georgia Bar No: 330315

DARREN W. PENN

Georgia Bar No. 571322

LAURA H. SPIRES

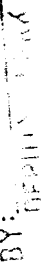
Georgia Bar No. 002447

400 Colony Square
1201 Peachtree St., NE, Suite 900
Atlanta, GA 30361
Telephone: (404) 961-7650
Attorneys for Plaintiffs

STATE COURT OF
DEKALB COUNTY, GA.

2011 MAY 25 PM 3:52

FILED


BY: 

CERTIFICATE OF SERVICE

This is to certify that I have this day submitted **MOTION TO EXTEND TIME FOR DISCOVERY** via U.S. Mail proper postage prepaid, addressed as follows:

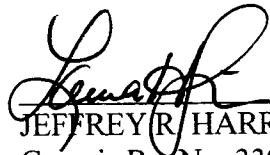
DREW, ECKL & FARNHAM, LLP
STEVAN A. MILLER
KATHRYN S. WHITLOCK
880 W. Peachtree Street
P.O. Box 7600
Atlanta, Georgia 30357

BELLI WEIL GROZBEAN & DAVIS
MELANIE C. EYRE
8010 Roswell Road, Suite 200
Atlanta, GA 30350

**WEINBERG, WHEELER, HUDGINS, GUNN
& DIAL, LLC**
ROBERT G. TANNER
JEFFREY N. AMASON
3344 Peachtree Road, Suite 2400
Atlanta, Georgia 30326

This the 25th day of May, 2011.

HARRIS PENN LOWRY DELCAMPO, LLP



JEFFREY R. HARRIS
Georgia Bar No: 330315
DARREN W. PENN
Georgia Bar No. 571322
LAURA H. SPIRES
Georgia Bar No. 002447

400 Colony Square
1201 Peachtree St., NE
Suite 900
Atlanta, GA 30361
Telephone: (404) 961-7650

Attorneys for Plaintiffs