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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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PACE LOCAL UNION 5-1967 : Case No. C-1-01 301
et al. (WEBER, JUDGE)
Plaintiffs : (Magistrate Judge Novotny)

WESTERN DISTRICT OF OHIO
CINCINNATI

vs.

INTERNATIONAL PAPER COMPANY : PLAINTIFF'S MOTION
FOR ADDITIONAL TIME
Defendant : TO FILE OBJECTIONS

Plaintiffs move for additional time to and including January 16, 2004, to file objections to the Magistrate's Report and Recommendation that Defendant's Motion for Summary Judgment be Granted, filed December 30, 2003.

MEMORANDUM

Plaintiffs' objections would be due to be filed January 9, 2004, ten days after the Magistrate's Report was filed. However, we have moved our law office which has disrupted our schedule, and we need more time to prepare objections to this rather momentous and we believe erroneous Report. Counsel for Defendant has no objection to our requested extension of time and asks for the same consideration from us, which is agreeable to us.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned attorney for Plaintiffs certifies that he served a copy of the above document upon Michael A. Roberts, attorney for Defendant, Graydon, Head & Richey, P.O. Box 6464, Cincinnati, Ohio 45210-6464, and upon Vincent J. Miraglia, Esq. and W. Carter Younger, Esq., McGuire Woods, 1050 Connecticut Avenue, N.W., Washington, DC 20036-5317, co-counsel for Defendant, by FAX this 6th day of January, 2004.



Robert I. Doggett (0016849)