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## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ANDREW M. SHECKTOR and : JEAN B. MARSHAMAN, :

CIVIL ACTION NUMBER:

Plaintiffs, :

VS.

**No.** 4:09-cv-01570-JEJ

LOUISVILLE LADDER, INC.,

afan dant

Defendant. :

## **STIPULATION**

AND NOW, this 20<sup>th</sup> day of September, 2011, it is hereby stipulated and agreed by and between Philip J. Berg, Esquire, counsel for Plaintiffs, Andrew Shecktor and Jean B. Marshman and J. Michael Kunch, Esquire, counsel for Defendant Louisville Ladder, Inc. a fourteen (14) day continuance for Plaintiffs to answer Defendant's Motion for Summary Judgment.

Defendant filed a Motion for Summary Judgment on or about August 30, 2011. Plaintiffs' response, if any, is due on or before September 21, 2011.

Plaintiffs' counsel sought a continuance due to the fact he had been out-of-town and experiencing severe medical complications. Defendant through counsel agreed to the continuance.

Therefore, it is hereby stipulated that Plaintiffs response to Defendants Motion for Summary Judgment is due on or before Wednesday, October 5, 2011.

## LAW OFFICES OF PHILIP J. BERG

Dated: September 20, 2011	/s/ Philip J. Berg Philip J. Berg, Esquire Attorney for Plaintiffs
	SWEENEY & SHEEHAN, P.C.
Dated September 20, 2011	/s/ J. Michael Kunsch J. Michael Kunsch Attorney for Defendant
BY THE COURT:	