

## KOLMAN ELY, P.C.

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August 13, 2013

**Via Facsimile 412-208-7427 & ECF Filing**

Honorable Mark R. Hornak  
United States District Court for the  
Western District of Pennsylvania  
700 Grant Street, 6<sup>th</sup> Fl.  
Room 6220, P.O. Box 1805  
Pittsburgh, PA 15219

**Re: *Christine Lynn Secilia v. Mt. Olive Borough Police Department***  
**Case No.: 13-0223**

Dear Judge Hornak:

I write to respond to the issues raised in Defendant, Mount Olive Borough's Motion to Compel responses to Second Request for Production, filed on August 6, 2013 (Docket Item 29.) I was on vacation when the motion was filed and returned today. I do not oppose the motion, but I respectfully request a period of 10 days within which to respond to Defendant's Second Request for Production of Documents (*i.e.*, by August 23, 2013.)

Respectfully submitted,

KOLMAN ELY, P.C.



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Wayne A. Ely, Esquire

cc: *Dean Falovolito, Esquire (via fax 412-995-3300)*  
*David Helwig, Esquire (via fax 412-391-8804)*

\* \* \* Communication Result Report ( Aug. 13. 2013 11:46AM ) \* \* \*

1)  
2)

Date/Time: Aug. 13. 2013 11:43AM

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
2514	Memory TX	14122087427	P. 1	OK	
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		14123918804		OK	

Reason for error  
 E. 1) Hang up or line fail  
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 E. 5) Exceeded max. E-mail size

E. 2) Busy  
 E. 4) No facsimile connection

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