

FILED
ADAMS COUNTY
CLERK OF COURT

2025 MAY 12 PM 3:37

IN THE COURT OF COMMON PLEAS OF ADAMS COUNTY OHIO
CIVIL DIVISION*Larry Heller*
CLERK

SHAWN D. COOLEY, et al.,

Plaintiffs,

vs.

JOSEPH EDGAR FOREMAN,
A/K/A AFROMAN, et al.,

Defendants.

Case No. 2023-0069

Judge Jerry McBride

JOINT MOTION TO EXTEND CASE SCHEDULE

Plaintiffs, Shawn D. Cooley, Justin Cooley, Michael D. Estep, Shawn S. Grooms, Brian Newland, Lisa Phillips, and Randolph L. Walters, Jr. ("Plaintiffs"), and Defendants, Joseph Foreman and Hungry Hustler Records ("Defendants"), by and through their respective counsel, hereby jointly move to extend the case schedule for this matter. The parties have coordinated schedules to allow the continuation and completion of additional discovery matters necessary following the Court's ruling on Plaintiffs' motion for judgment on the pleadings. To that end, additional time is needed to complete discovery, submit dispositive motions, and schedule a trial.

The following revised deadlines are proposed:

- | | |
|---------------------------------|-----------------------------------|
| • Discovery Deadlines - | Revised: October 3, 2025 |
| • Expert Reports: | Revised: October 17, 2025 |
| • Rebuttal Excerpt Reports: | Revised: October 31, 2025 |
| • Motions for Summary Judgment: | Revised: November 14, 2025 |
| • Trial: | Revised: March 2026 |

Plaintiffs and Defendants jointly and respectfully stipulate that this extension has been proposed in good faith and is not intended for any purposes of delay or destruction. The parties continue to cooperate in moving this forward and agree to adhere to the above proposed modified, extended case schedule.

Respectfully submitted,

/s/ David Moser

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CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served by email, this 12th day of May 2025, upon the following:

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