

FILED
ADAMS COUNTY
CLERK OF COURT

2025 NOV -3 PM 1:17

IN THE COURT OF COMMON PLEAS OF ADAMS COUNTY OHIO
CIVIL DIVISION

SHAWN D. COOLEY, et al.,

Plaintiffs,

vs.

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

Defendants.

Case No. 2023-0069

Judge Jerry McBride

Larry Heller
CLERK

JOINT MOTION TO EXTEND MOTIONS DEADLINE

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 deadline for motions for summary judgment in this matter. The parties have coordinated schedules to allow a brief extension for the provision of discovery, which in turn requires a short extension to allow all parties sufficient time to review materials and file their motions for summary judgment. To that end, additional time is needed for filing motions, which the parties submit should not alter any remaining trial schedules currently set by the Court.

The following revised deadline is proposed:

- Motions for Summary Judgment:

- Current: November 14, 2025

Revised: December 5, 2025

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 case 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 3rd day of November, 2025, upon the following:

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