

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF
PENNSYLVANIA,

Plaintiff,

v.

PENNSYLVANIA STATE
CONSTABULARY,

Defendant.

CERTIFICATE OF COMPLIANCE

The undersigned certifies that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

MEYER, UNKOVIC & SCOTT LLP

By: /s/ Roy E. Leonard
Roy E. Leonard

) CIVIL DIVISION

)

) No. SA-23-000552

)

) **MOTION TO EXTEND POST-TRIAL**
) **BRIEFING DEADLINE**

)

) Filed on Behalf of: Defendant,
) Pennsylvania State Constabulary

)

) Counsel of Record for this Party:

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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF)	CIVIL DIVISION
PENNSYLVANIA,)	
)	
Plaintiff,)	No. SA-23-000552
)	
v.)	
)	
PENNSYLVANIA STATE)	
CONSTABULARY,)	
)	
Defendant.)	

MOTION TO EXTEND
POST-TRIAL BRIEFING DEADLINE

Defendant Pennsylvania State Constabulary (the “Constabulary”) moves this Court to enter an Order extending the deadline for submission of post-trial briefing in this matter, stating as follows:

1. An evidentiary hearing was held in this matter on July 11, 2024.
2. At that time, the parties presented documentary and testimonial evidence, as well as oral argument on novel issues of law.
3. At the conclusion of the hearing, this Court allotted the Constabulary two weeks to obtain a copy of the July 11, 2024, hearing transcript (the “Hearing Transcript”).
4. From receipt of the Hearing Transcript, the Constabulary was provided two weeks to file and serve proposed findings of fact and conclusions of law.
5. Despite the Constabulary’s diligent efforts, the Hearing Transcript was not received until July 30, 2024.
6. Upon receipt, the Constabulary identified numerous typographical errors throughout the Hearing Transcript that still require correction before the same can be filed with the Court.

7. Accordingly, the Constabulary has not yet received a final copy of the Hearing Transcript.

8. Without this final copy, the Constabulary is unable to finalize its proposed findings of fact and conclusions of law for filing.

9. For this reason, the Constabulary requests that this Court grant additional time to procure a final copy of the Hearing Transcript and extend the deadline to file and serve proposed findings of fact and conclusions of law from August 13, 2024, to August 30, 2024.

WHEREFORE, the Constabulary asks this Court to grant this motion and enter the attached Order.

Date: August 9, 2024

Respectfully submitted,

/s/ Roy E. Leonard

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*Counsel for Defendant, Pennsylvania State
Constabulary*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **MOTION TO EXTEND POST-TRIAL BRIEFING DEADLINE** has been served upon the following by e-mail on this 9th day of August, 2024, addressed as follows:

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Counsel for Plaintiff

/s/ Roy E. Leonard _____

Roy E. Leonard

*ATTORNEYS FOR DEFENDANT,
PENNSYLVANIA STATE CONSTABULARY*

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF)	CIVIL DIVISION
PENNSYLVANIA,)	
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Plaintiff,)	No. SA-23-000552
)	
v.)	
)	
PENNSYLVANIA STATE)	
CONSTABULARY,)	
)	
Defendant.)	

ORDER

AND NOW, this ____ day of _____, 2024, Defendant’s Motion to Extend Post-Trial Briefing Deadline is hereby GRANTED.

It is ORDERED that the parties shall file and serve their respective proposed findings of fact and conclusions of law by August 30, 2024.

BY THE COURT:

_____, J.