

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARK HORTON,)
)
 Plaintiff,)
)
 v.) Case No. 4:17-CV-2324
)
 MIDWEST GERIATRIC)
 MANAGEMENT, LLC,)
)
 Defendant.)

**DEFENDANT’S CONSENT MOTION FOR ADDITIONAL TIME
TO FILE REPLY IN SUPPORT OF ITS MOTION TO DISMISS**

COMES NOW Defendant Midwest Geriatric Management, LLC (“MGM” or “Defendant”), by and through its counsel, and for its Consent Motion for Additional Time to File Reply in Support of its Motion to Dismiss, states as follows:

1. On August 28, 2017, Plaintiff Mark Horton (“Plaintiff”) filed his Complaint alleging violations of Title VII (Counts I and II) and a violation of state law (Count III).
2. On September 26, 2017, MGM filed its Motion to Dismiss each of Counts I-III.
3. On September 28, 2017, Plaintiff sought additional time, up to and including October 13, 2017, within which to file his Opposition to MGM’s Motion to Dismiss. MGM consented to said extension, which the Court granted.
4. On October 12, 2017, Plaintiff filed his Opposition to MGM’s Motion to Dismiss.
5. Pursuant to Local Rule 4.01, MGM’s Reply in Support of its Motion to Dismiss is due within (7) days of the filing of Plaintiff’s Opposition, *i.e.*, October 19, 2017.
6. Given the press of ongoing business and to fully address Plaintiff’s Opposition arguments, MGM respectfully requests an additional fourteen (14) days, up to and including November 2, 2017, within which to file Defendant’s Reply in Support of its Motion to Dismiss.

7. The requested extension is made in good faith and proper purposes and, if granted, will not unduly prejudice any party.

8. MGM's counsel has conferred with Plaintiff's counsel, and Plaintiff's counsel has consented to the requested extension.

WHEREFORE, Defendant Midwest Geriatric Management, LLC respectfully requests that the Court grant an additional fourteen (14) days, up to and including November 2, 2017, for Defendant to file Defendant's Reply in Support of its Motion to Dismiss.

Dated: October 13, 2017

Respectfully submitted,

/s/ Michael L. Jente

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CERTIFICATE OF SERVICE

I hereby certify that, on October 13, 2017, a true and correct copy of the foregoing was served via the Court's electronic filing system upon all counsel of record, pursuant to the Court's Local Rules.

/s/ Michael L. Jente