

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JEREMIAH LYLE VAN TASSEL	:	
Petitioner	:	
	:	Case No. 1:21-cv-172 Erie
v.	:	Magistrate Judge Richard A. Lanzillo
	:	
MICHAEL CLARK,	:	
Respondent	:	

RESPONDENT DISTRICT ATTORNEY OF ERIE COUNTY'S
MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

AND NOW, this 18th day of August, 2021, comes the Respondent District Attorney's Office of Erie County, by and through Assistant District Attorney Gregory M. Reichart, and avers the following:

1. The District Attorney's Office of Erie County, hereinafter referred to as "the Respondent", received this Honorable Court's Order to Respond on July 30, 2021.
2. Pursuant to this Order, the Respondent was given twenty-one (21) days to respond. Thus, the Answer is due on August 19, 2021.
3. The Respondent needs further time to appropriately review the file, research the issues, and respond the Petition.
4. The Respondent respectfully requests that this Honorable Court grant an extension of thirty (30) days to respond. In accordance with Federal Rule 6 of Civil Procedure, the new date for response would be Monday, September 20, 2021.
5. This is the first request by the Respondent for a continuance.
6. This Motion is not being presented for purposes of delay nor will the Petitioner be prejudiced by the granting of this Motion.

7. A copy of this Motion is being sent to the Petitioner as a Certificate of Service is included below.

WHEREFORE, for the foregoing reasons, the Respondent respectfully requests that this Honorable Court grant this request for an extension of time. A Proposed Order shall be submitted with the Motion.

Respectfully submitted,

/s/ Gregory M. Reichart
Assistant District Attorney
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PA ID No. 311692
Counsel for Respondent District Attorney of
Erie County

CERTIFICATE OF SERVICE

On this day, I hereby certify that a true and accurate copy of the Respondent District Attorney of Erie County's Motion for an Extension of Time is being served upon the Petitioner in the manner described below which satisfies the requirements of F.R.C.P. 5:

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