

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
Bruce J. Scambler,)
)
Defendant.)

Case No. CJ-2014-1346

FILED IN DISTRICT COURT
OKLAHOMA COUNTY
APR 8 2015
COURT CLERK
57

PLAINTIFF'S MOTION FOR ADDITIONAL TIME TO RESPOND TO DISCOVERY

Plaintiff moves the Court for an Order enlarging the time, until **June 22, 2015**, for it to respond to the interrogatories, requests for production, and requests for admission (Discovery Requests) that Defendant served on Plaintiff. This Motion is made on the following grounds:

1. Defendant served the Discovery Requests on Plaintiff on April 7, 2015. Plaintiff's responses to the Discovery Requests are due on or before May 7, 2015.
2. Plaintiff requires additional time to respond to the Discovery Requests because Plaintiff's counsel needs time to decipher the Discovery Requests and examine voluminous documents but has been unable to do so due to the time involved in addressing all of the recent filings in this matter. Plaintiff will not be able to prepare complete and accurate responses to the Discovery Requests before the May 7th deadline.

3. Plaintiff has made no previous requests for an extension of time to respond to the Discovery Requests.

Defendant has informed Plaintiff that he objects to this request. Defendant's counsel of record does not object. A proposed order granting the relief requested is attached.

Respectfully submitted,



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Telephone: (405) 608-2700
Defendant pro se

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 24th day of April, 2015, a true and correct copy of the above and foregoing motion was mailed with postage prepaid thereon, addressed to:

Jeffrey D. Black
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3555 N.W. 58th St., #1000
Oklahoma City, OK 73112
Attorney for Defendant

Bruce Scambler
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Terra Bonnell

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ORDER

This matter came before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, upon Plaintiff's motion for additional time to respond to interrogatories, requests for production, and requests for admission (Discovery Requests) that Defendant served on Plaintiff on April 7, 2015. The Court finds cause to enlarge the time for Plaintiff to respond to the Discovery Requests.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff's motion for additional time to respond to the Discovery Requests is granted and its time to respond to the Discovery Requests is extended to June 22, 2015.

Dated this ___ day of _____, 2015.

DISTRICT COURT JUDGE

Approved:

Amanda Cornmesser (OBA No. 20044)
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Attorneys for Plaintiff

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the _____ day of _____, 2015, a true and correct copy of the above and foregoing Order was mailed with postage prepaid thereon, addressed to:

Jeffrey D. Black
Bonham & Howard
3555 N.W. 58th St., #1000
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Attorney for Defendant

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