

APPALACHIAN RESEARCH AND DEFENSE FUND OF KENTUCKY, INC. *File*

P. O. BOX 152
PRESTONSBURG, KENTUCKY 41653
606/886-3876

January 4, 1982

AREA OFFICES:

BARBOURVILLE, KY.
COLUMBIA, KY.
HARLAN, KY.
HAZARD, KY.
JACKSON, KY.
LEXINGTON, KY.
MANCHESTER, KY.
PIKEVILLE, KY.
PRESTONSBURG, KY.
RICHMOND, KY.
SOMERSET, KY.

ADMINISTRATIVE OFFICE:

P. O. BOX 152
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606/886-3876
JOHN M. ROSENBERG,
DIRECTOR

Hon. G. Wix Unthank
District Judge
United States District Court
Eastern District of Kentucky
Federal Building
Pikeville, KY 41501

RE: Martin Shepherd v. Skip Salyers
NO. 81-90

Dear Judge Unthank:

As you probably know the Respondent in this case has been seriously injured in an automobile accident. Therefore, the parties have not been able to complete discovery in this case by January 4 as required by the Court's order of October 5, 1981. In light of this situation, I sent on December 29, 1981, the attached letter and joint motion to Respondent's counsel, David Lemaster. Mr. Lemaster has agreed to the motion and the Court should be receiving shortly a copy of the motion signed by both counsel.

Respectfully,

Addison Parker

Addison Parker
Attorney for Martin
Shepherd

AP/bc

Enclosure
cc: Hon. David Lemaster

APPALACHIAN RESEARCH AND DEFENSE FUND OF KENTUCKY, INC.

P. O. BOX 152

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December 29, 1981

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606/886-3876
JOHN M. ROSENBERG,

DIRECTOR

Hon. David Lemaster
Howard Building
95 Main Building
Prestonsburg, KY 41653

RE: Martin Shepherd v. Skip Salyers
U.S. District Court
Eastern District of Kentucky
Pikeville Division, 81-90

Dear Mr. Lemaster:

Enclosed is a joint motion for additional time in this case. If there are any problems with this motion, or if you feel that 30 days is not enough time, please let me know. Otherwise please sign the motion and return one copy to me and send the other on to the Court.

Thank you.

Sincerely,

Addison Parker

Addison Parker
Attorney for Martin
Shepherd

AP/bc

Enclosure

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
PIKEVILLE DIVISION
CASE NO. 81-90

MARTIN SHEPHERD

PLAINTIFF

vs.

JOINT MOTION FOR
AN EXTENSION OF TIME

SKIP SALYERS

DEFENDANT

* * * * *

Come the parties, by counsel, and jointly move the Court for an additional thirty days to comply with the Court's order of October 5, 1981. In support of this motion, the parties state that Respondent has been seriously injured in an automobile accident thereby making it impossible for either party to complete discovery by January 4, 1982 as previously ordered by the Court.

Addison Parker
ADDISON PARKER
Attorney for Petitioner

Appalachian Research & Defense
Fund of Kentucky, Inc.
205 Front Street
Prestonsburg, KY 41653
606-886-3876

DAVID LEMASTER
Attorney for Respondent

Howard Building
95 Main Street
Prestonsburg, KY 41653