

**COMMONWEALTH OF KENTUCKY
BOONE CIRCUIT COURT
CASE NO: 03-CI-181**

JUDGE JOHN POTTER

JOHN DOE, et al.,

PLAINTIFFS

vs.

ROMAN CATHOLIC DIOCESE OF COVINGTON, et al.,

DEFENDANTS

JOINT MOTION TO CONTINUE TRIAL DATE

The parties jointly request that the Court continue the trial date, which is currently set for April 11, 2005. In support of their joint motion, the parties state as follows:

1. The parties' settlement discussions have been productive and have resolved a number of difficult issues that are necessary to a settlement of class members' claims. While there are issues that remain to be resolved, the parties believe that those issues ultimately can be resolved and that a settlement will be accomplished with some additional work.

2. Because of the ongoing settlement negotiations, the parties have essentially suspended discovery and trial preparation, except for the briefing and trial plans specifically requested by the Court. At this point, even if the settlement discussions were not continuing, we believe that the April 11 trial date would not allow sufficient time for the parties to complete fact discovery, disclose experts and depose each others' experts, exchange witness and exhibit lists, file and brief pretrial motions, submit proposed jury instructions, and complete the many other tasks that would be necessary before trial.

WHEREFORE, the parties respectfully request that the Court continue the trial date for a reasonable time period, to be determined at the March 3, 2005 pretrial hearing.

Respectfully Submitted,



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