

1 prevented him from working for two days of this week, as he was unable
2 to read and sit in front of a computer.

3 2. Plaintiff/Relator Judy Anne Mikovits is also moving the Court to continue
4 the date by which Defendant Geoff Dean's Motion for Summary Judgment
5 is heard (currently set for September 21, 2015) until after Yom Kippur
6 (which is September 22-23), as the date the Court has set makes it
7 extremely difficult for attorney Mike Hugo to travel from Boston, attend
8 the hearing, and then be back in Boston to accommodate a family dinner
9 that must be concluded prior to sunset on September 21, 2015, and then go
10 to temple.

11 3. Counsel is requesting that the hearing on the Motion for Summary
12 Judgment be continued until all the hearings go forward in November of
13 2015, on the date set by the court for the remaining pending motions
14 which are directed at the amended complaint.

15 4. Plaintiff will be prejudiced in this matter if this request/motion is not
16 granted as she will be precluded from opposing the Motion for Summary
17 Judgment in a timely fashion (which resulted from her attorneys'
18 unplanned medical emergency), and will be potentially precluded from
19 having her attorney present at the hearing to represent her (as a result of
20 the religious holiday which begins on sun down on September 21, 2015.)

21 5. Counsel for Plaintiff met and conferred with defense counsel about this
22 subject of this motion. Defense counsel refused to agree to any
23 continuance that might inconvenience the court.

24
25 Dated: 9/4/15

/s/ Robert J. Liskey
Robert J. Liskey
Declarant