

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

WM. ROBERTS WILSON, JR. AND
ROBERTS WILSON, JR., P.C. successor to
WM. ROBERTS WILSON, JR., P.A.

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:09CV006-NBB-SAA

RICHARD F. SCRUGGS,
RICHARD F. SCRUGGS, P.A.,
SMBD, INC. f/k/a SCRUGGS LEGAL, P.A.
f/k/a SCRUGGS, MILLETTE, BOZEMAN AND DENT, P.A.,
SLF, INC. f/k/a THE SCRUGGS LAW FIRM, P.A.,
EDWARD J. PETERS, STEVEN A. PATTERSON,
TIMOTHY BALDUCCI, DAVID ZACHARY SCRUGGS, and
JOHN DOES 1-10

DEFENDANTS

PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANT STEVEN A. PATTERSON'S MOTION TO DISMISS

COME NOW the plaintiffs, Wm. Roberts Wilson, Jr., and Roberts Wilson, Jr., P.C., by and through their attorneys, and file this motion for thirty additional days from September 8, 2009, to file a response and submit a memorandum in opposition to the motion to dismiss filed by defendant Steven A. Patterson. In support of this motion, Wilson would show that the schedules of counsel necessitate more time to formulate a response in this action and that there is no objection from the defendant Patterson to this request for thirty additional days.

WHEREFORE, PREMISES CONSIDERED, Wilson prays for thirty additional days or until October 8, 2009 to file an opposition and memorandum in opposition to the motion filed by the defendant Steven A. Patterson cited above.

Respectfully submitted, this the 28th day of August, 2009.

MERKEL & COCKE
A Professional Association
Post Office Box 1388
30 Delta Avenue
Clarksdale, Mississippi 38614
(662) 627-9641
(662) 627-3592 telefax
Attorneys for Plaintiffs

By: /s/Charles M. Merkel, Jr.
CHARLES M. MERKEL, JR. (MSB2884)
cmerkel@merkel-cocke.com

OF COUNSEL:

VICKI R. SLATER, MSB# 9759
VICKI R. SLATER, ATTORNEY AT LAW, P.A.
1554 LAKESIDE DRIVE
POST OFFICE BOX 23981
JACKSON, MISSISSIPPI 39225-3981
TELEPHONE: (601)987-8184
FACSIMILE: (601)987-8188

WILLIAM B. KIRKSEY, MSB# 4183
KIRKSEY & ASSOCIATES
POST OFFICE BOX 33
JACKSON, MISSISSIPPI 39205-0033
TELEPHONE: (601)354-4662
FACSIMILE: (601)354-2433

CYNTHIA I. MITCHELL, MSB #3356
CHARLES M. MERKEL, JR. MSB# 2884
MERKEL & COCKE, P.A.
30 DELTA DRIVE
POST OFFICE BOX 1388
CLARKSDALE, MISSISSIPPI 38614-1388
TELEPHONE: (662)-627-9641
FACSIMILE (662)627-3592

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2009, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Gerald H. Jacks, Esquire
Jamie F. Jacks, Esquire
Jacks, Adams & Norquist, P.A.
gjacks@jacksadamsnorquist.com
jjacks@jacksadamsnorquist.com

Hiram Eastland, Jr, Esquire
eastlandlaw@bellsouth.net

J. Cal Mayo, Jr., Esquire
Paul Bowie Watkins, Jr., Esquire
Pope S. Mallette, Esquire
cmayo@mayomallette.com
pwatkins@mayomallette.com
pmallette@mayomallette.com

Michael D. Greer, Esquire
mgreer@greerlawfirm.com
Attorney for Steve Patterson

Judson M. Lee, Esquire
jlee@ms-lawyer.net
Attorney for Ed Peters

William B. Kirksey, Esquire
msslawyer4183@aol.com
Attorney for Plaintiffs

And I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

Timothy Balducci
12739-042
FCI-Estill
Satellite Camp - Unit F
P.O. Box 699
Estill, SC 29918

By: /s/Charles M. Merkel, Jr.
CHARLES M. MERKEL, JR., MSB 2884