

IN THE COURT OF COMMON PLEAS OF NORTHAMPTON COUNTY, PENNSYLVANIA
APPLICATION FOR CONTINUANCE

INSTRUCTIONS

- 1. Use ball point pen or typewriter. Make sure all copies are legible.
2. Do not separate copies. Applying counsel shall submit all copies to other counsel who will indicate the action taken in Section IV and indicate whether the continuance is opposed or unopposed.
3. The entire form shall be submitted to the appropriate Judge as indicated.* The Court will indicate the action taken in Section VI. Applying counsel shall see that the original and copies are distributed as listed below.

*P.J. - President Judge A.J. - Assigned Judge M.J. - Motions Judge D.J. - Domestic Judge

I. APPLICATION IS HEREBY MADE TO CONTINUE THE FOLLOWING CASES:

Borough of Bath, Petitioner VS. Michael Long, Respondent NO. 2024-01039



COMPANION CASE:

Case Scheduled for: [] Pre-Trial Conf. (A.J.) [x] Argument (P.J.) [] Non-Jury Trial (P.J.) [] Trial (P.J.)

[] Domestic Relations ((D.J.) [] Arbitration (M.J.) Other: Motion for Sanctions
on November 26, 2024 List No. November 26, 2024

II. NUMBER OF PREVIOUS CONTINUANCES: 0 by Plaintiff 0 by Defendant.

III. APPLICATION IS MADE FOR THE FOLLOWING REASONS:

Requesting continuance only for the hearing on the Borough's Motion for Sanctions due to overlapping deadlines and need for adequate time to prepare a response. Timeline fails to abide by agreement signed off by judge in pretrial conference which provided me with additional time to respond as pro-se.

Respondent, Pro Se

November 13, 2024

Self

Applying Counsel

Date

Representing

Phone (610) 507-3721

IV. APPLICATION IS OPPOSED/UNOPPOSED FOR THE FOLLOWING REASONS:

There are no overlapping deadlines here, as the Borough's brief in support of its appeal is due 11/22/24, and Respondent's brief is due 30 days from service per 9/24/24 Order. Respondent has until 11/21/24 to file a responsive brief to this motion. Respondent had notice of need to withdraw frivolous motions.

J. Chadwick Schnee, Esq.

11/14/2024

Borough of Bath

Opposing Counsel

Date

Representing

Phone (717) 400-5955

V. REMARKS BY CALENDAR CONTROL SUPERVISOR/DOMESTIC RELATIONS DIRECTOR:

VI. ACTION TAKEN BY THE COURT and NOW, this

15th day of November, 2024

[x] Application is refused.

[] Application is granted and the case is continued.

[] Generally

[] To

[] To a new date to be scheduled within days

[] No further continuances

FILED stamp: 2024 NOV 15 A 1:09 COURT OF COMMON PLEAS CIVIL DIVISION NORTHAMPTON COUNTY PA

Handwritten signature of Judge