

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

SAMUEL K. LIPARI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 07-CV-00849-FJG
)	
GENERAL ELECTRIC COMPANY, et al.,)	
)	
Defendants.)	

**DEFENDANTS HEARTLAND FINANCIAL GROUP, INC. AND CHRISTOPHER
McDANIEL'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S AMENDED COMPLAINT**

Defendants Heartland Financial Group, Inc. and Christopher McDaniel hereby move this Court for a seven (7) day extension of time, to and including February 27, 2008, in which to respond to the Plaintiff's Amended Complaint. In support of this motion, defendants Heartland Financial Group, Inc. and Christopher McDaniel state as follows:

1. Undersigned counsel was recently engaged to represent the interests of Heartland Financial Group, Inc. and Christopher McDaniel in this matter.
2. Defendants Heartland Financial Group, Inc. and Christopher McDaniel were served on January 31, 2008, and their responsive pleadings are presently due on February 20, 2008.
3. Counsel has reviewed the pleadings in this matter, yet needs to conduct further investigation in order to properly frame responsive pleadings for these two defendants.
4. This request for extension of time is not interposed for delay, but in order to give counsel adequate opportunity to investigate and prepare responsive pleadings.

WHEREFORE the defendants Heartland Financial Group, Inc. and Christopher McDaniel hereby move this Court for a seven (7) day extension of time, to and including February 27, 2008, in which to answer or otherwise respond to Plaintiff's Amended Complaint.

HUSCH & EPPENBERGER, LLC

By: /s/ Michael S. Hargens

John K. Power #35312
Michael S. Hargens #51077
1200 Main Street, Suite 2300
Kansas City, MO 64105
Telephone: (816) 421-4800
Facsimile: (816) 421-0596
john.power@husch.com
Michael.hargens@husch.com

ATTORNEYS FOR DEFENDANTS
HEARTLAND FINANCIAL GROUP, INC.
AND CHRISTOPHER MCDANIEL

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was forwarded this 18th day of February, 2008, by first class mail, postage prepaid to:

Samuel K. Lipari
297 NE Bayview
Lee's Summit, MO 64064

And an electronic copy was filed via the CM/ECF system which will send a notice of electronic filing to the following:

Nick Badgerow
Spencer Fane Britt & Browne LLP
9401 Indian Creek Parkway, Suite 700
Overland Park, KS 66210

/s/ Michael S. Hargens