

**IN THE STATE OF MISSOURI
JACKSON COUNTY SIXTEENTH CIRCUIT COURT**

SAMUEL K. LIPARI)	
<i>Plaintiff</i>)	
)	
vs.)	
)	
CHAPEL RIDGE MULTIFAMILY LLC ,)	
SWANSON MIDGLEY LLC,)	
CHRISTOPHER BARHORST,)	Case No. 0916-CV38273
HOLLY L. FISHER,)	
REGUS PLC,)	
REGUS MANGEMENT GROUP LLC,)	RICO Mail and Wire Fraud
LIANNE ZELLMER,)	RICO Conspiracy
WELLS FARGO,)	Under 18 USC § 1961, <i>et seq.</i>
WACHOVIA DEALER SERVICES INC.,)	
TROPBITO & MILLER LLC.,)	Contract and Interference With
CHRIS M. TROPBITO,)	Business Expectancies
NICHOLAS L. ACKERMAN,)	
TONY R. MILLER)	
GENERAL ELECTRIC COMPANY,)	
GENERAL ELECTRIC CAPITAL)	
BUSINESS ASSET FUNDING CORPORATION,)	<u>Jury Trial Requested</u>
GE TRANSPORTATION SYSTEMS)	
GLOBAL SIGNALING, L.L.C.)	
JEFFREY R. IMMELT)	
<i>Defendants</i>)	

**MOTION FOR EXTENSION OF TIME
TO ANSWER DEFENDANT TROPBITO & MILLER LLC'S
MOTION AND SUGGESTION TO DISMISS THE PLAINTIFF'S AMENDED PETITION**

Comes now the petitioner, Samuel K. Lipari appearing *pro se* and respectfully requests an extension of time in which to answer the defendants' motion to dismiss and its accompanying suggestion of law. The plaintiff respectfully requests the extension for the following reasons:

1. The petition is very complicated.
2. The defendants' Motion includes exhibits and arguments that will take a detailed answer.

Whereas for the above stated reasons the plaintiff respectfully requests the court grant an extension to February 25, 2010.

Respectfully submitted,

S/Samuel K. Lipari

SAMUEL K. LIPARI

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was forwarded this 5 day of February 2010 by hand delivery, by first class mail postage prepaid, or by email to:

Marrow, Willnauer & Klosterman, LLC
James C. Morrow
Abagil L. Pierpoint
Executive Hills East, Bldg. A
10401 Holmes Suite 300
Kansas City, MO 64131; (816) 382-1382
jmorrow@mwklaw.com
apierpoint@mwklaw.com

ATTORNEY FOR DEFENDANT
SWANSON & MIDGLEY LLC,
CHRISTOPHER BARHORST
HOLLY L FISHER
4600 MADISON STE 1100
KANSAS CITY, MO 64112; (816) 842-6100
cbarhorst@swansonmidgley.com
hfisher@swansonmidgley.com

ATTORNEY FOR DEFENDANT
CHAPEL RIDGE MULTIFAMILY LLC; 3460 NE
AKIN BOULEVARD LEES SUMMIT, MO 64064

Bryan Cave LLP
Keitha M. Wright
1200 Main Street
3500 One Kansas City Place
Kansas City, MO 64105
816-374-3370 (direct)
keitha.wright@bryancave.com

ATTORNEY FOR DEFENDANT'S LEANNE
ZELLMER 2300 MAIN ST. STE 900 KANSAS
CITY, MO 64108; (816) 448-3100
lianne.zellmer@regus.com

REGUS PLC; 26 BOULEVARD ROYAL L-2449
LUXEMBOURG; +44 (0) 1932 895059 C/O
REGUS PLC REGISTERED OFFICE 22
GRENVILLE STREET; ST. HELIER; JERSEY,
JE4 8PX

REGUS MANGEMENT GROUP LLC; 15305
DALLAS PARKWAY STE 1400 ADDISON, TX
75001 C/O REGISTERED AGENT CSC
LAWYERS INCORPORATING SERVICE, INC.;
150 S PERRY ST. MONTGOMERY, AL
36104

Deacy & Deacy, LLP
Spencer J. Brown
920 Main Street, Suite 1900
Kansas City, Missouri 64105-2010
(816) 421-4000
cld@deacylaw.com

ATTORNEY FOR DEFENDANT'S
TROPBITO & MILLER LLC
NICHOLAS L. ACKERMAN
CHRIS L TROPBITO
TONY R MILLER
508 WALNUT STREET
KANSAS CITY, MO 64106 (816) 221-6006
nla@troppitomiller.com
trm@troppitomiller.com
cmt@troppitomiller.com

ATTORNEY FOR WACHOVIA DEALER
SERVICES INC.; 8575 W 110TH ST, STE 100
OVERLAND PARK, KS 66210 WELLS FARGO;
420 MONTGOMERY STREET, SAN
FRANCISCO, CALIFORNIA 94163; (866) 249-
3302

Husch Blackwell Sanders LLP
John K. Power
Michael Thompson
Sean Tassi
1200 Main Street Suite 2300
Kansas City, MO 64105 (816) 283-4651
john.power@huschblackwell.com
michael.thompson@huschblackwell.com
sean.tassi@huschblackwell.com

ATTORNEYS FOR GENERAL ELECTRIC
COMPANY, GENERAL ELECTRIC CAPITAL
BUSINESS ASSET FUNDING
CORPORATION AND GE
TRANSPORTATION SYSTEMS GLOBAL
SIGNALING, LLC

Arnold & Porter LLC
Jonathan I. Gleklen
555 12th Street, N.W.
Washington, D.C. 20004
jonathan.gleklen@aporter.com

ATTORNEY FOR JEFFREY R. IMMELT
3135 EASTON TURNPIKE
FAIRFIELD, CT 06828-0001 (203) 373-2211

S/ Samuel K. Lipari

SAMUEL K. LIPARI
803 S. Lake Drive
Independence, MO 64064
816-507-1328
saml@medicalsupplychain.com
Plaintiff, *Pro Se*