

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

LALANEA STAR LITTLE,  
INDIVIDUALLY AND AS NEXT  
FRIEND OF MINOR CHILD, A. L.

Case No: 20-cv-11857  
Hon. Thomas L. Ludington

Plaintiffs,

v.

PRESQUE ISLE COUNTY,  
DEPARTMENT OF CHILD PROTECTIVE  
SERVICES, DR. TIMOTHY STRAUSS,  
INDIVIDUALLY AND IN HIS OFFICIAL  
CAPACITY, JULIE MCALLISTER LEAZIER,  
INDIVIDUALLY AND IN HER OFFICIAL  
CAPACITY,

Defendants.

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**PLAINTIFF'S MOTION TO EXTEND THE TIME FOR SERVICE**

NOW COMES Plaintiffs, by and through the undersigned counsel, pursuant to Rule 4(m) of the Federal Rules of Civil Procedure, and move this Honorable Court to issue an Order extending the summons for an appropriate period, allowing Plaintiffs to serve Defendants Presque Isle County and Department of Child Protective Services, and for their request, state as follows:

1. On October 8, 2020, this Court Ordered Plaintiffs to show cause why the matter should not be dismissed for lack of prosecution, under L.R. 41.2. (ECF No. 4, Order at ¶1.)

2. On October 22, Plaintiffs responded submitting that the matter should not be dismissed, as Plaintiffs have been working to identify unnamed Defendants and serve them with a live pleading that reflects the appropriate posture of the case.

3. Plaintiffs have taken reasonable and diligent action on the case; and in the days that followed, Plaintiffs have discovered additional facts, identified previously unnamed Defendants and, accordingly, amended the Original Complaint. (ECF No. 5, Amended Complaint.)

4. The Amended Complaint now captures all appropriate claims against all named Defendants and is primed for service.

WHEREFORE, for good cause shown, Plaintiffs respectfully request that this Honorable Court grant Plaintiff's motion and issue an Order extending the summons for an appropriate period, to allow Plaintiffs to serve Defendants Presque Isle County and Department of Child Protective Services.

Respectfully submitted,

**LAW OFFICE OF ALLISON FOLMAR, ESQ.**

BY: /s/Allison Folmar  
Allison Folmar (P60236)  
Attorney for Plaintiffs  
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Dated: November 2, 2020

**BRIEF IN SUPPORT OF  
PLAINTIFF'S MOTION TO EXTEND THE TIME FOR SERVICE**

NOW COMES Plaintiffs, by and through the undersigned counsel, and hereby rely upon Federal Rules of Civil Procedure No. 4(m), in support of their Motion herein.

Respectfully submitted,

**LAW OFFICE OF ALLISON FOLMAR, ESQ.**

BY: /s/Allison Folmar  
Allison Folmar (P60236)  
Attorney for Plaintiffs  
24901 Northwestern Hwy, Suite 612  
Southfield, MI 48075  
(313) 926-7220  
allisonfolmargiv@aol.com

Dated: November 2, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing paper with the Clerk of the Court using the Court's ECF system, which will send notification of such filing to all counsels of record.

/s/ Allison Folmar  
Allison Folmar (P60236)

Dated: November 2, 2020