

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

ANNA WHITE FERRARACCIO, PLAINTIFF,
v. CIVIL ACTION NO. 5:24-cv-00700
NEW PEOPLES BANK, DEFENDANT.

DEFENDANT'S MOTION TO EXTEND DISCOVERY

The Defendant, New Peoples Bank ("hereinafter referred to as "NPB"), moves to extend the discovery completion deadline by a period of forty-five (45) days. Counsel has conferred with counsel for the Plaintiff, and counsel for the Plaintiff has no objection to this request for extension.

In support of the motion, NPB states that the discovery deadline currently January 5, 2026, falls approximately forty-five (45) days after the cutoff for written discovery on November 19, 2025, but includes the time periods for Thanksgiving and Christmas which makes scheduling depositions extremely difficult. The testimony of the parties and witnesses in depositions will be critical to case development.

The parties have no objection to a rescheduling of the other deadlines set by the Court as the Court determines necessary.

WHEREFORE, the Defendant, New Peoples Bank, prays that the discovery deadlines set by the Court be extended as stated.

NEW PEOPLES BANK,
By Counsel.

/s/ William S. Winfrey, II

William S. Winfrey, II (WVSB #4093)

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CERTIFICATE OF SERVICE

I, WILLIAM S. WINFREY, II, of counsel for Defendant, do hereby certify that a true and correct copy of the foregoing Defendant's Motion to Extend Discovery has this day been electronically filed with the Clerk of the Court and served upon counsel of record for the Plaintiff *via* the CM/ECF filing system.

This the 24th day of November, 2025.

/s/ William S. Winfrey, II
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