

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,	)	Civil Action No.
	)	2:23-CV-10957-JJCG-EAS
<i>Plaintiff,</i>	)	
	)	District Judge Jonathan J.C.
v.	)	Grey
	)	
KEVIN R. ADELL, individually;	)	Magistrate Judge Elizabeth A.
KEVIN R. ADELL as the Personal	)	Stafford
Representative of the ESTATE OF	)	
FRANKLIN Z. ADELL;	)	
ADELL BROADCASTING CORP.;	)	
RALPH G. LAMETI as Trustee of	)	
the ORCHARD LAKE PROPERTY	)	
TRUST; and	)	
OAKLAND COUNTY	)	
TREASURER, STATE OF	)	
MICHIGAN,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

JOINT MOTION TO EXTEND TRIAL AND RELATED DEADLINES

Plaintiff United States of America and Defendants Kevin R. Adell, individually and as Personal Representative of the Estate of Franklin Z. Adell, Ralph G. Lameti, as trustee of the Orchard Lake Property Trust, and Adell Broadcasting Corporation (collectively “the Parties”), jointly move under Fed. R. Civ. P. 6(b)(1)(A) and 16(b) for an order that extends

the trial date and all of the pretrial deadlines set by the Court by at least 90 days. In support thereof, the Parties respectfully submit as follows:

1. On June 26, 2025, the parties concluded discovery, including 10 depositions.

2. On June 30, 2025, the parties filed a Joint Request for Referral to ADR before Magistrate Judge Elizabeth A. Stafford. *See* ECF No. 40.

3. On September 29, 2025, the Court set a virtual status conference with Magistrate Judge Stafford on October 3, 2025, at 11:00 AM ET. ECF No. 42.

4. Prior to the Court setting the status conference with Magistrate Judge Stafford, the parties worked together to develop a plan to hopefully resolve the present dispute without the need for trial. The parties are prepared to discuss such plan with Magistrate Judge Stafford on October 3, 2025.

5. A court may modify a scheduling order “only for good cause and with the judge’s consent.” *Hunter v. Holmes*, No. 20-10534, 2023 WL 2393631, at *3 (E.D. Mich. Mar. 7, 2023), *aff’d*, No. 20-10534, 2023 WL 2987555 (E.D. Mich. Apr. 18, 2023). To determine good cause, the court

must consider the moving party's diligence and any prejudice to the opposing party.

6. The Parties have diligently pursued discovery throughout this case, which is complex and document intensive. An extension to the trial date and pretrial schedule will allow the parties to pursue mediation with Magistrate Judge Stafford with the same diligence.

7. The parties propose the following modified schedule, which will provide sufficient time to pursue mediation with Magistrate Judge Stafford while accommodating counsel's other trial schedules:

Motions (except motions <i>in limine</i>)	January 31, 2026
Trial	July 13, 2026, or later

8. Because this is a joint request, there is no prejudice to either party if the Court grants the extension.

Respectfully submitted,

UNITED STATES OF AMERICA,
by:

/s/ Daniel Caves (with consent)

DANIEL M. CAVES
ANDERSON P. HESTON
Trial Attorneys, Tax Division
U.S. Department of Justice
P.O. Box 55
Washington, D.C. 20044
202-514-6058 (v) | 202-514-5238 (f)
Daniel.M.Caves@usdoj.gov
Anderson.P.Heston@usdoj.gov

Local Counsel:

JEROME F. GORGON, JR.
United States Attorney
Eastern District of Michigan

KEVIN ERSKINE (P69120)
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, MI 48226
Telephone: (313) 226-9610
Email: Kevin.Erskine@usdoj.gov

*Attorneys for the Plaintiff United
States of America*

/s/ Todd Welty

M. TODD WELTY
MACDONALD A. NORMAN
DANIEL B. WHARTON
KOSTELANETZ LLP
4279 Roswell Rd NE
Suite 208, #352
Atlanta, Georgia 30342
Telephone: (404) 301-4791
Fax: (678) 680-7901
twelty@kostelanz.com
mnorman@kostelanz.com
dwharton@kostelanz.com

*Attorneys for the Defendants
Kevin Adell, Ralph Lameti, and
Adell Broadcasting Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,	)	Civil Action No.
	)	2:23-CV-10957-JJCG-EAS
<i>Plaintiff,</i>	)	
	)	District Judge Jonathan J.C.
v.	)	Grey
	)	
KEVIN R. ADELL, individually;	)	Magistrate Judge Elizabeth A.
KEVIN R. ADELL as the Personal	)	Stafford
Representative of the ESTATE OF	)	
FRANKLIN Z. ADELL;	)	
ADELL BROADCASTING CORP.;	)	
RALPH G. LAMETI as Trustee of	)	
the ORCHARD LAKE PROPERTY	)	
TRUST; and	)	
OAKLAND COUNTY	)	
TREASURER, STATE OF	)	
MICHIGAN,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**ORDER GRANTING JOINT MOTION TO
EXTEND TRIAL AND RELATED DEADLINES**

WHEREAS on October 1, 2025, the plaintiff United States of America and the defendants Kevin R. Adell, Ralph G. Lameti, and Adell Broadcasting Corporation (jointly, the “Parties”) filed a joint motion to extend the beginning of trial and related deadlines (ECF No. 45); and

WHEREAS, being fully informed of the premises, the Court finds that good cause exists to grant the Parties’ joint motion.

IT IS HEREBY ORDERED that:

1. The Parties' joint motion to extend the beginning of trial and related deadlines (ECF No. 45) is GRANTED.

2. The Court's scheduling order (ECF No. 33), as modified (ECF No. 39) is hereby amended as follows:

Motions (except motions <i>in limine</i>)	January 31, 2026
Trial	July 13, 2026, or later

IT IS SO ORDERED.

Date: _____

HON. JONATHAN J.C. GREY
U.S. District Judge