

DOCKET NO. WWM-15-6009136 S

MELANIE PEREZ : SUPERIOR COURT  
*Plaintiff* :  
 :  
 : JUDICIAL DISTRICT OF WINDHAM  
v. : AT PUTNAM  
 :  
 :  
STATE OF CONNECTICUT :  
JUDICIAL DEPARTMENT :  
*Defendant* : August 4, 2016

**MOTION FOR EXTENSION OF TIME TO RESPOND TO OFFER OF COMPROMISE**

The Defendant, State of Connecticut Judicial Branch hereby moves for a thirty (30) day extension of time to and including October 3, 2016<sup>1</sup> in which to file a response to the Offer of Compromise filed by the plaintiff. Plaintiff's Offer of Compromise was filed on August 2, 2016 (Docket Entry No. 130.00). In support of its motion, the Defendant, through counsel, represents as follows:

1. Pursuant to Conn. Gen. Stat. § 52-192a, the plaintiff filed the Offer of Compromise on her complaint on August 2, 2016.
2. Pursuant to the statute, Defendant has thirty days to accept or reject the Offer of Compromise. The current deadline to respond is September 1, 2016.
3. Undersigned counsel is going on vacation next week and will not have an opportunity to discuss the offer with the client agency.
4. Assistant Attorney General Ann E. Lynch, who is department head for the Employment Rights Department to which this matter is assigned, will be out of the office on vacation the week of August 15-19, 2016. AAG Lynch must be present at

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<sup>1</sup> A 30-day extension of time would bring it to Saturday, October 1, 2016 when state offices, including those of the Attorney General, are closed. Therefore the request is until Monday, October 3, 2016.

the meeting with the client when settlement decisions are discussed. With vacation schedules, counsel will not be able to meet with the client until sometime in September.

5. Counsel for the Defendant needs additional time in which to contact and consult with the client agency regarding the Offer of Compromise.
6. Undersigned counsel has contacted plaintiff's counsel, Magdalena Wiktor, Esq., regarding this motion and she has NO OBJECTION to this motion.
7. Dispositive motions in the instant matter are currently due by September 1, 2016.
8. Trial has been set for this matter for March 9-10, 2017.
9. There is no prejudice to the plaintiff in this request.

WHEREFORE, the Defendant Judicial Branch requests a 30-day extension of time to and including October 3, 2016 in which to file its response to the Offer of Compromise.

DEFENDANT  
STATE OF CONNECTICUT  
JUDICIAL BRANCH

GEORGE JEPSEN  
ATTORNEY GENERAL

By: /s/ Josephine S. Graff  
Josephine S. Graff  
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**CERTIFICATION**

The undersigned hereby certifies that on August 4, 2016 a true and accurate copy of the foregoing was sent by United States mail, first class postage prepaid, to the following:

Magdalena Wiktor, Esq.  
Madsen, Prestley and Parenteau, P.C.  
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*/s/ Josephine S. Graff* \_\_\_\_\_  
Josephine S. Graff  
Assistant Attorney General