

DOCKET NO. WWM-15-6009136 S

MELANIE PEREZ	:	SUPERIOR COURT
<i>Plaintiff</i>	:	
	:	JUDICIAL DISTRICT OF WINDHAM
v.	:	AT PUTNAM
	:	
STATE OF CONNECTICUT	:	
JUDICIAL DEPARTMENT	:	
<i>Defendant</i>	:	October 6, 2016

MOTION FOR EXTENSION OF TIME RE: SCHEDULING ORDER

The Defendant, State of Connecticut Judicial Branch hereby moves for a modification of the Scheduling Order in the instant matter for good cause shown. In support of its motion, the Defendant, through counsel, represents as follows:

1. The current Scheduling Order has a deadline of October 15, 2016 for the matter to appear on the short calendar; a January 11, 2017 date for a pre-trial conference and a date of March 9, 2017 for the Joint Trial Management Conference and commencement of the trial.
2. Defendant filed its Motion for Summary Judgment on September 1, 2016 (Docket Entry No. 132.00) in accordance with the Scheduling Order that was in effect.
3. Plaintiff's response was due by September 30, 2016.
4. Plaintiff's counsel filed on September 8, 2016 a request for extension of time until October 14, 2016 (Docket Entry No. 136.00) which was granted by the Court on September 9, 2016. (Docket Entry No. 136.10)
5. Plaintiff's counsel, based upon a death in the family, has filed a motion for extension of time to move out her response deadline to **November 4, 2016**, absent objection.

6. Because of the plaintiff's change to the scheduling order, and subsequent request to extend her deadline even further, the defendant will not have time to review the plaintiff's objection to the motion for summary judgment or file a reply by October 15, 2016, which is the current deadline for the matter to be argued.
7. Defendant represents that the matter would have to appear on the short calendar of November 7, 2016 in order to give the Court the 120 days as required pursuant to Practice Book § 11-19 to render a decision prior to the current March 9, 2017 trial date.
8. Wherefore the defendant respectfully moves that the Scheduling Order be modified as follows:

	<u>Current</u>	<u>Proposed</u>
Oral argument deadline:	Oct. 15, 2016	January 19, 2017
Pre-trial conference	Jan. 11, 2017	TBD
Trial Management Conference	March 9, 2017	June 13, 2017
Trial Date	March 9-10, 2017	June 20-21, 2017

8. The plaintiff will not be prejudiced by the delay.
9. Undersigned counsel has consulted with plaintiff's counsel, Magdalena Wiktor, Esq.,

and she has NO OBJECTION to this Motion.

WHEREFORE, the Defendant Judicial Branch requests a modification of the Scheduling Order as outlined in paragraph 7 above.

DEFENDANT
STATE OF CONNECTICUT
JUDICIAL BRANCH

GEORGE JEPSEN
ATTORNEY GENERAL

By: /s/ Ann E. Lynch
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CERTIFICATION

The undersigned hereby certifies that on October 6, 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.
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/s/ Ann E. Lynch
Ann E. Lynch
Assistant Attorney General