

DOCKET NO. FST-CV15-5014808-S)	SUPERIOR COURT
)	
WILLIAM A. LOMAS)	JUDICIAL DISTRICT OF
)	STAMFORD/NORWALK
Plaintiff,)	
)	
v.)	AT STAMFORD
)	
PARTNER WEALTH MANAGEMENT, LLC,)	
KEVIN G. BURNS, JAMES PRATT-HEANEY,)	
WILLIAM P. LOFTUS)	
)	OCTOBER 20, 2016
Defendants.)	

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO PLEAD TO DEFENDANTS’
COUNTERCLAIM**

The Plaintiff, William Lomas (“Lomas”), hereby moves for an extension of time in the amount of fourteen (14) days, up to and including November 7, 2016, within which to plead to Defendants’ Answer and Counterclaim (Dkt. No. 184.00). In support of this motion, Lomas represents as follows:

1. Lomas commenced this action by writ of summons and complaint made returnable to this Court on August 18, 2015.
2. On September 23, 2016, Defendants filed an Answer and Counterclaim Complaint . The Counterclaim is lengthy and detailed, including 73 pages, 12 causes of action, and 210 separately numbered paragraphs.
3. A response to the Answer and Counterclaim is presently due on October 24, 2016.
4. Lomas’ counsel requires additional time to evaluate the allegations in the Counterclaim and to formulate a proper responsive pleading. Lomas’ counsel expects to be able to do so promptly and within the requested 14 day period so as not to delay this matter.

5. This is Lomas' first request for an extension of time to plead to Defendants' Answer and Counterclaim.

WHEREFORE, for the foregoing reasons, Lomas respectfully requests that this Court grant this motion, allowing an extension of time of 14 days, up to and including November 7, 2016, within which to plead to Defendants' Answer and Counterclaim (Dkt. No. 184.00).

Dated: October 20, 2016
Hartford, Connecticut

THE PLAINTIFF,
WILLIAM A. LOMAS

By: /s/ Thomas J. Rechen
Thomas J. Rechen
Brittany A. Killian
McCarter & English, LLP
City Place I
185 Asylum Street
Hartford, CT 06103
Tel.: (860) 275-6700
Fax: (860) 724-3397

CERTIFICATE OF SERVICE

This is to certify that on October 20, 2016, a copy of the foregoing was served by e-mail and first class mail, postage prepaid, to all counsel of record as follows:

Richard J. Buturla, Esq.
Mark J. Kovack, Esq.
Berchem, Moses & Devlin, P.C.
75 Broad St.
Milford, CT 06460

Gerard Fox, Esq.
Edward D. Altabet, Esq.
Steven I. Wallach, Esq.
Gerard Fox Law P.C.
12 East 49th Street, Suite 2605
New York, NY 10017

/s/Thomas J. Rechen
Thomas J. Rechen