MOTION FOR CONTINUANCE
JD-CV-21 Rev. 2-13
C.G.S. § 52-196
P.B. § 14-23, 14-24

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

COURT USE ONLY
MFCSE

Instructions To Person Making Motion

Fill out all sections of this form except the Order section and file it with the Clerk of the Court at least three (3) days before the date of the scheduled event.

Docket number: **FBT-CV-15-6048078**

Name of case *(Full name of Plaintiff v. Full name of Defendant)*
SHAPIRO, JONATHAN v. DELBOUNO, FRANK Et Al

[X] Judicial District [ ] Housing Session [ ] Geographical Area Number ____

Address of Court *(Number, street, town and zip code)*: **1061 MAIN STREET BRIDGEPORT, CT 06604**

Date of Motion	Sequence Number on Short Calendar *(If applicable)*	Name of Judge Who Scheduled the Event this Continuance is Requested for *(If applicable)*
Nov-3-2016		**Bellis, J.**

Date of Scheduled Event: **Nov-30-2016**

Person Making Motion is: [ ] Plaintiff's Attorney [ ] Plaintiff [X] Defendant's Attorney [ ] Defendant [ ] Other ____

Firm Name, if Applicable	Address	Phone Number (with area code)
BRIDGEPORT CITY ATTORNEY	**OFFICE OF CITY ATTORNEY 999 BROAD STREET BRIDGEPORT, C**	**203-576-7647**

Event For Which Continuance Is Requested: *("X" applicable box(es) and explain below)*

[ ] Arbitration
[ ] Administrative Appeal Hearing
[ ] Attorney Trial Referee Proceeding
[ ] Court Trial
[ ] Judicial-Alternative Dispute Resolution (J-ADR)
[ ] Early Intervention Conference
[ ] Fact-Finding
[ ] Foreclosure Mediation
[X] Jury Trial
[ ] Hearing In Damages
[ ] Pretrial
[ ] Status Conference
[ ] Trial Management Conference
[ ] Other ____

Reason(s) For Continuance Request: *("X" reason(s) and provide an explanation)*

[ ] Counsel not ready ____
[ ] Lay witness not available *(Name of witness)* ____
[ ] Counsel not available ____
[ ] Party not available *(Name of party)* ____
[ ] Expert witness not available *(Name of witness)* ____
[X] Discovery not complete ____
[X] Other **Plaintiff's late disclosure ..**

Continue explanation, if necessary:

Ptf's late disclosure of medical records mandates further defense discovery re recontinued ptf's depo, ptf's Drs.' depos, IMR/IME and supp discovery as to issues raised in newly disclosed records. See also 11/3/16 Memo in Support of Continuance.

For the above reason(s), I request this case be continued to (date): May-11-2017 or [X] at the court's discretion.

I have contacted all counsel and self-represented parties of record about my intention to seek a continuance. All of the counsel and self-represented parties:

[ ] Consent [X] Do Not Consent [ ] Have not responded to the above motion for continuance and requested continuance date.

Note: An agreement to continue a matter does not mean that the motion will automatically be granted by the court.

I agree to be responsible for notifying my client, if applicable, and all counsel of record and self-represented parties whether the continuance is granted or denied, and if granted, the new date of the scheduled event.

Certification

I certify that a copy of this document was mailed or delivered electronically or non-electronically on *(date)* **Nov-3-2016** to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Name and address of each party and attorney that copy was mailed or delivered to*

CLENDENEN & SHEA LLC - 400 ORANGE STREET/NEW HAVEN, CT 06511

Signed *(Signature of filer)*	Print or type name of person signing	Date signed
▶ **101334**	**LAWRENCE OUELLETTE JR**	**Nov-3-2016**

Mailing address *(Number, street, town, state and zip code)*: **142 TEMPLE STREET SUITE 201 NEW HAVEN, CT 06510**

Telephone number: **203-576-7647**

Order	Motion For Continuance is: [ ] Granted [ ] Denied	Matter Continued To:	Signed *(Judge)*	Date

*If necessary, attach additional sheet or sheets with name and address which the copy was mailed or delivered to.