

D.N.: CV-14-6049044-S

NUCAP INDUSTRIES, INC. <u>et al.</u> ,)	SUPERIOR COURT
)	
Plaintiffs,)	JUDICIAL DISTRICT
)	OF NEW HAVEN
V.)	AT NEW HAVEN
)	
PREFERRED TOOL AND DIE, INC., et al.,)	
)	
Defendants.)	JANUARY 14, 2015

DEFENDANTS' INITIAL MOTION FOR EXTENSION OF TIME

Pursuant to P.B. 1998 §§ 13-7 and 13-10, Defendants Preferred Tool and Die, Inc. and Preferred Automotive Components, a division of Preferred Tool and Die, Inc. (“Defendants”) hereby move for an extension of thirty (30) days, up to and including February 23, 2015, to object or respond to Plaintiffs NUCAP Industries Inc. and Nucap US, Inc. as successor to Anstro Manufacturing’s December 23, 2014 Interrogatories and Requests for Production (collectively the “Discovery Requests”) and state as reasons therefor:

1. Good cause supports this motion. Responses or objections to the Discovery Requests are currently due on or before January 23, 2015. Because of the holiday period and the quantity of the Discovery Requests, Defendants require additional time to confer with counsel and prepare their responses.
2. The pleadings are not closed in this matter, and this action has not been assigned for trial.
3. This is Defendants’ first motion for an extension of time with respect to the Discovery Requests.

**ORAL ARGUMENT NOT REQUESTED
TESTIMONY NOT REQUIRED**

4. Defendants' counsel has attempted to contact Plaintiffs' counsel to determine Plaintiffs' position as to this motion. To date, Plaintiffs' counsel has not responded to Defendants' counsel's inquiry.

WHEREFORE, the time for Defendants to object or respond to the Discovery Requests should be extended by thirty (30) days, up to and including February 23, 2015.

THE DEFENDANTS
PREFERRED TOOL AND DIE,
INC. and
PREFERRED AUTOMOTIVE
COMPONENTS
BY THEIR ATTORNEY

/s/Stephen J. Curley/102917
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CERTIFICATE OF SERVICE

This will certify that a copy of the foregoing was sent via electronic delivery based upon express written consent, this 14th day of January, 2015, to all counsel and pro se parties of record, including:

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