

DOCKET NO. UWY-CV-14-6026552-S	:	SUPERIOR COURT
	:	
NUCAP INDUSTRIES INC., ET AL.,	:	J.D. WATERBURY
Plaintiffs,	:	
	:	
VS.	:	AT WATERBURY
	:	
PREFERRED TOOL AND DIE, INC., ET AL.,	:	
Defendants.	:	JUNE 16, 2015

PLAINTIFFS’ MOTION FOR AN EXTENSION OF TIME TO RESPOND TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to Practice Book Sections 13-7(a)(2) and 13-10(a)(2), Plaintiffs, Nucap Industries Inc. (“Nucap Industries”) and Nucap US Inc., as the successor to Anstro Manufacturing (“Nucap US”) (collectively “Plaintiffs”), respectfully file this Second Motion for an Extension of Time to file their responses and/or objections to the Interrogatories and Requests for Production of Documents of Defendants Preferred Tool and Die, Inc. (“Preferred Tool”), and Preferred Automotive Components, a division of Preferred Tool and Die (“Preferred Automotive”) (collectively, “Preferred”). Good cause exists in support of this Motion, as follows:

1. Preferred served its First Set of Requests for Production and Interrogatories on April 20, 2015 and Plaintiffs’ responses and objections are due on or before June 19, 2015.
2. Preferred previously has sought two extensions to respond to Plaintiffs’ discovery in this matter, which were both granted.
3. There is good cause to extend Plaintiffs’ deadline to respond to Preferred’s discovery requests, as Preferred has served a broad set of document requests and interrogatories that include requests for the production of Plaintiffs’ confidential and trade secret materials.

4. Given both the volume and nature of the documents and information that will be captured by Preferred's discovery requests, additional time is necessary to allow Plaintiffs to fully and properly object and respond to the Requests.

5. The pleadings are not closed and the case has not been set for trial.

6. This is Plaintiffs' second request for an extension of its deadline to object or respond to Preferred's discovery requests.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant their Motion and extend the time for Plaintiffs' to object and/or respond to Preferred's Interrogatories and Requests for Production by thirty (30) days, making Plaintiffs' responses and objections due on or before July 20, 2015.

PLAINTIFFS,
NUCAP INDUSTRIES, INC.
and NUCAP US, INC.

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CERTIFICATION

This is to certify that a copy of the foregoing was mailed, postage prepaid or delivered electronically or non-electronically, on this 16th day of June, 2015 to all counsel and self-represented parties of record, as follows:

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