

DOCKET NO. WWM-CV15-6009136 S

MELANIE PEREZ	:	SUPERIOR COURT
<i>Plaintiff</i>	:	
	:	
v.	:	JUDICIAL DISTRICT OF WINDHAM
	:	AT PUTNAM
STATE OF CONNECTICUT	:	
JUDICIAL DEPARTMENT	:	
<i>Defendant</i>	:	July 17, 2015

MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS AND/OR RESPOND TO PLAINTIFF’S INTERROGATORIES AND REQUESTS FOR PRODUCTION

The defendant, State of Connecticut Judicial Department, in the above-captioned matter, pursuant to Practice Book § 13-7, hereby respectfully moves for an extension of time of thirty (30) days to and including August 28, 2015 to file their objections and/or respond to plaintiff’s interrogatories and requests for production served by the plaintiff, dated May 27, 2015. In support of its motion, the defendant, through counsel represents as follows:

1. The plaintiff’s interrogatories and requests for production on the defendant were received on May 28, 2015.
2. Counsel for the defendant has forwarded the discovery requests to the client agency for its review.
3. Counsel for the defendant represents that additional time will be required to review the Interrogatories, accumulate the documents in order to respond to the production request, and review the documents deemed responsive to ensure none are privileged.
4. This is the defendant’s second request for an extension of time to respond to the discovery requests.

5. Counsel contacted plaintiff's counsel, Magdalena Wiktor, Esq., but received no response.
6. The undersigned certifies that this matter has not been assigned for trial.

WHEREFORE, the defendant respectfully requests a 30-day extension of time to and including August 28, 2015 in which to respond to plaintiffs' discovery requests.

DEFENDANT,

GEORGE JEPSEN
ATTORNEY GENERAL

BY: /s/ Josephine S. Graff
Josephine S. Graff
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CERTIFICATION

I hereby certify that on July 17, 2015 a copy of the foregoing Motion for Extension of Time to File Objections and/or Respond to Plaintiff's Interrogatories and Requests for Production was mailed, first class postage prepaid, to all parties of record as follows:

Magdalena Wiktor, Esq.
Madsen, Prestley & Parenteau, LLC
105 Huntington Street
New London, CT 06320
Tel: (860) 442-2466

Josephine S. Graff
Josephine S. Graff
Commissioner of the Superior Court