

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>	:	August 27, 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 two weeks to and including September 11, 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. The current deadline is August 28, 2015.
3. Counsel for the defendant only recently became aware that the contact individual from the client agency who was involved in gathering the documents was out of the office on vacation and would not return until August 28, 2015.
4. Counsel for the defendant represents that additional time will be required to review the Interrogatories and the documents received from the client agency to ensure none are privileged before forwarding them to plaintiff’s counsel.

4. This is the defendant's third request for an extension of time to respond to the discovery requests.

5. Counsel contacted plaintiff's counsel, Magdalena Wiktor, Esq., and she has NO OBJECTION to this motion.

6. The undersigned certifies that this matter has not been assigned for trial.

WHEREFORE, the defendant respectfully requests a 14-day extension of time to and including September 11, 2015 in which to respond to plaintiffs' discovery requests.

DEFENDANT,

GEORGE JEPSEN
ATTORNEY GENERAL

BY: /s/ Josephine S. Graff
Josephine S. Graff
Assistant Attorney General
Juris No.428723
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120
Tel.: (860) 808-5340
Fax: (860) 808-5383
E-mail: Josephine.Graff@ct.gov

CERTIFICATION

I hereby certify that on August 27, 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