

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.	:	JANUARY 28, 2016

**PLAINTIFFS' REQUEST FOR EXTENSION OF TIME TO RESPOND AND/OR OBJECT TO DEFENDANTS' REQUESTS FOR ADMISSION AND SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Practice Book Sections 13-7(a)(2), 13-10(a)(2), and 13-23, Plaintiffs, Nucap Industries Inc. ("Nucap Industries") and Nucap US Inc., as the successor to Anstro Manufacturing ("Nucap US") (collectively "Plaintiffs" or "NUCAP"), respectfully file this Request for an Extension of Time to file their responses and/or objections to the Requests for Admission, and Second Set of Interrogatories and Requests for Production of Documents (collectively the "Requests") of Defendants Preferred Tool and Die, Inc. ("Preferred Tool"), and Preferred Automotive Components, a division of Preferred Tool and Die ("Preferred Automotive") (collectively, "Preferred"). In support of their Request, Plaintiffs state as follows:

1. Preferred served the Requests on December 30, 2015 and Plaintiffs' responses and objections are due on or before January 29, 2016.
2. The pleadings are not closed and the case has not been set for trial.
3. There is good cause to extend Plaintiffs' deadline to respond to Preferred's Requests, because due to the number and complexity of Preferred's requests, additional time is needed in order to fully and properly respond.

4. By email dated January 25, 2016, Ben Lehberger, counsel for Preferred consented to the Plaintiff's request for a one week extension of time within which to file its objections and responses to the Requests.

5. This is Plaintiffs' first request for an extension with respect to these Requests.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant a one week extension of time, making their responses and objections due on or before February 5, 2016.

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

By /s/Nicole H. Najam

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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 28<sup>th</sup> day of January, 2016 to all counsel and self-represented parties of record, as follows:

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*/s/Nicole H. Najam*

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