

COMMONWEALTH OF MASSACHUSETTS

ESSEX, SS.

SUPERIOR COURT DEPARTMENT
C.A. NO.: 2177CV00572

WILLIAM FAHEY,
Plaintiff,

v.

ANDREW FLANAGAN, Individually and as
Manager for the TOWN OF ANDOVER
Defendants.

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**JOINT MOTION TO EXTEND DISCOVERY AND ALL
SUBSEQUENT DEADLINES BY FOUR MONTHS**

The Parties request that this Honorable Court extend the tracking order deadlines in this matter for a period of four (4) months. As grounds, the Parties state the following:

1. Since the case was filed, the Parties have served and answered a majority of written discovery and completed two out of approximately seventeen (17) potential depositions.
2. The Parties jointly request additional time to complete necessary depositions and any other discovery that may be required after the depositions are taken.
3. The Parties request that the Court extend the deadlines as follows:

Discovery Deadline: September 20, 2023

Rule 56 Service Deadline: October 20, 2023

Rule 56 Filing Deadline: November 21, 2023

Pre-Trial Conference to be rescheduled after close of discovery on a date convenient for the court.

4. No party will be prejudiced by the allowance of this motion, and it will not in any way significantly delay the proceedings. The parties appreciate the court's understanding in this regard.

For these reasons, the Parties request that the scheduling order be reset in accordance with the dates set forth herein.

Respectfully submitted,

Defendants,
Andrew P. Flanagan, Individually and as
Manager of the Town of Andover,
By their attorneys,

/s/ Allison L. O'Connell

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was filed through the eFileMA system on April 18, 2023 and copies will be sent electronically to registered participants. True copies will otherwise be served upon any attorneys of record who are not listed on the eFileMA system by email only on April 18, 2023

/s/ Allison L. O'Connell

Allison L. O'Connell, BBO# 690219