

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

<b>CYNTHIA MCFADDEN,</b>	:	<b>CIVIL NO.: 302 CV 1980 (CFD)</b>
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>BOEHRINGER INGELHEIM PHARMACEUTICALS, INC.</b>	:	
	:	
<b>Defendant.</b>	:	<b>January 6, 2004</b>

**MOTION FOR EXTENSION  
OF DISCOVERY DEADLINE**

Pursuant to Rule 6 of the Federal Rules of Civil Procedure, Rule 6(b)(1) of the Local Rules of Civil Procedure, the defendant, Boehringer Ingelheim Pharmaceuticals, Inc. ("BIPI") respectfully requests an extension of the discovery deadline in this case for a period of sixty (60) days, up to and including March 30, 2004, and an extension of the subsequent deadlines accordingly.

As grounds for this motion, BIPI states as follows:

1. The current deadline for completing discovery is January 30, 2004.
2. Despite diligent efforts by both the plaintiff and the defendant, the parties have not yet been able to obtain the Social Security Administration's records regarding the plaintiff. These records are anticipated to contain information that is highly relevant to the plaintiff's disability claims. The extension of the discovery deadline is necessary to provide BIPI with additional time to try to obtain the Social Security Administration's records.
3. The additional time is also necessary in order to take the depositions of the plaintiff and some of her past and present treatment providers.

4. The plaintiff consents to this extension of time.
5. This is the first request by BIPI for an extension of the discovery deadline.

For these reasons, BIPI respectfully requests the Court to grant its motion to extend the discovery deadlines in the above-captioned matter by 60 days, and to extend all subsequent deadlines accordingly.

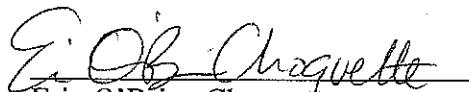
DEFENDANT,  
BOEHRINGER INGELHEIM  
PHARMACEUTICALS, INC.

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**CERTIFICATION**

This is to certify that a copy of the foregoing was mailed this 6<sup>th</sup> day of January 2004 to:

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