

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

CYNTHIA MCFADDEN,

Plaintiff,

v.

BOEHRINGER INGELHEIM
PHARMACEUTICALS, INC.

Defendant.

CIVIL NO.: 302 CV 1980 (CFD)

January 6, 2004

**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:

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.

QUANTIFIED. It is so ordered.
Christopher F. Drono, III, D.D.
Hartford, CT