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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

CYNTHIA McFADDEN,
Plaintiff,

CIVIL NO.
3:02CV1980 (CFD)

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BOEHRINGER INGELHEIM
PHARMACEUTICALS, INC.,

Defendant.

March 19, 2004

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U.S. DISTRICT COURT
MANTFORD,

**JOINT 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 plaintiff, Cynthia McFadden, and the defendant, Boehringer Ingelheim Pharmaceuticals, Inc. ("BIPI"), respectfully request an extension of the discovery deadline in this case for a period of forty-five (45) days, up to and including May 14, 2004, and an extension of the subsequent deadlines accordingly.

As grounds for this motion, the parties state as follows:

1. The current deadline for completing discovery is March 30, 2004.
2. As of June 1, 2004, Attorney Phelan will be joining the New York City law firm of Outten & Golden as a partner and opening a branch office for the firm in Stamford, Connecticut. Plaintiff's counsel, Gary Phelan, had one associate, Tanya Wolanic who had been assigned to this case. Because Attorney Wolnic decided not to relocate to Stamford, she began interviewing in January, 2004 and was hired by Jackson Lewis and started at that firm on February 2, 2004. Attorney Phelan began interviewing to

Granted. So ordered.
Pl [redacted] v. DJ 3/29/04

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MANTFORD, CT