

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 08-11955-PBS

**STACEY HIGHTOWER,
Plaintiff**

v.

**CITY OF BOSTON and BOSTON
POLICE COMMISSIONER
EDWARD DAVIS
Defendants**

ASSENTED-TO MOTION TO EXTEND FILING DEADLINES

Now come the Defendants and hereby respectfully request that this Honorable Court extend the scheduling order filing deadlines by one-week in this case as follows:

<u>Deadline</u>	<u>Current Date</u>	<u>Requested Date</u>
Opposition and Cross-Motion	February 28, 2011	March 7, 2011
Plaintiff's Reply	March 14, 2011	March 21, 2011
Defendants' Reply	March 28, 2011	April 4, 2011

As grounds, the Defendants state that counsel for the Defendants, Lisa Maki, is currently in the midst of a six-seven day trial in Suffolk Superior Court on the case of City of Boston v. Isaac Beck, Trustee of Channel Trust et al. SUVC 2007-01949. The trial has suffered several delays due to court closures caused by inclement weather and as a result has gone longer than expected. The Defendants seek only a week-long extension to file their cross-motion for summary judgment and opposition. Plaintiff has assented to the Defendants' request for a week-long extension and seeks a one-week extension to file any reply to Defendants' cross-motion for summary judgment. The Defendants seek a one-week extension to file any reply to Plaintiff's reply. Also, this Court rescheduled the hearing date from April 7, 2011 to April 18, 2011. As such, all motions and replies will be filed with the Court by April 4, 2011, well before the April 18, 2011 hearing date.

Wherefore, the Defendants request that this Honorable Court extend the scheduling order filing deadlines in the manner stated above.

In assent,
PLAINTIFF, STACEY HIGHTOWER

By her attorney,

/s/ Alan Gura

Alan Gura, Esquire
Gura & Possessky, PLLC
101 N. Columbus Street, Suite 405
Alexandria, VA 22314
(703) 835-9085

Respectfully submitted,

DEFENDANTS, THE CITY
CITY OF BOSTON and BOSTON POLICE
COMMISSIONER EDWARD DAVIS

By their attorney,

/s/ Lisa Skehill Maki

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Dated: February 7, 2011

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2011 this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Lisa Skehill Maki
Lisa Skehill Maki

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on February 2, 2011 counsel for the Defendants conferred with counsel for the Plaintiff pursuant to Local Rule 7.1 and the Plaintiff has assented to the extension sought by the Defendants.

/s/ Lisa Skehill Maki
Lisa Skehill Maki