

UNITED STATES DISTRICT COURT
 DISTRICT OF MASSACHUSETTS

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JEAN BATTY; EDWARD RUSSO; MARY)		
LEARNING; KEN TRUDELL; MATT WOLF;)		
PAUL P. BARNETT; CRAIG VACCA; DAVID)		
GOLDMAN; JANELE GOLDMAN; and)	CIVIL ACTION NO.	
COMMONWEALTH SECOND AMENDMENT,)	1:15-cv-10238-FDS	
INC.,)		
)		
Plaintiffs,)		
)		
-against-)		
)		
KEN ALBERTELLI, in his official Capacity as)		
Chief of the Winchester Police Department;)		
RICHARD C. GRIMES, in his Official Capacity)		
as Chief of the Weymouth Police Department;)		
WILLIAM TAYLOR, in his Official Capacity as)		
Superintendent of the Lowell Police Department;)		
and DAVID A. PROVENCHER, in his Official)		
Capacity as Chief of the New Bedford Police)		
Department,)		
)		
Defendants.)		
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ASSENTED TO MOTION TO EXTEND DEADLINE

Plaintiffs respectfully move the Court to extend the deadline for responding to Defendant Superintendent Taylor’s motion to stay (Doc. No. 18) by one week, from May 18, 2015 to May 25, 2015. As good cause for this motion, Plaintiffs state:

- 1) Superintendent Taylor moved to stay this action, and to enlarge the time for responding to the Amended Complaint, on May 4, 2015 (Doc. No. 18). Pursuant to LR 7.1(b)(2), Plaintiffs’ response is due on May 18, 2015.
- 2) Plaintiffs’ undersigned counsel was traveling on business at the time of Superintendent Taylor’s motion and for most of the remaining week. Upon returning home, an unexpected litigation urgency arose in an unrelated case and has consumed much of counsel’s

week to date. Under current plans, Counsel now needs to travel abroad to meet with a client over the due date for the response.

3) In light of these circumstances and developments, Plaintiffs respectfully request a one-week extension of the time for responding to Superintendent Taylor's motion.

4) Counsel for Superintendent Taylor has assented to this motion to extend.

Respectfully submitted,

THE PLAINTIFFS,
By their attorneys,

/s/ David D. Jensen
David D. Jensen, Esq.
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Dated: May 14, 2015

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 14 May 2015.

/s/ David D. Jensen
David D. Jensen