

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JEAN BATTY; EDWARD RUSSO; MATT
WOLF; PAUL P. BARNETT; CRAIG VACCA;
and COMMONWEALTH SECOND
AMENDMENT, INC.,

Plaintiffs,

-against-

KEN ALBERTELLI, in his official Capacity as
Chief of the Winchester Police Department; and
WILLIAM TAYLOR, in his Official Capacity as
Superintendent of the Lowell Police Department,

Defendants.

CIVIL ACTION NO.
1:15-cv-10238-FDS

**PARTIALLY UNOPPOSED MOTION TO ENLARGE THE DEADLINES
PERTAINING TO PLAINTIFFS’ SUMMARY JUDGMENT MOTION BY ONE DAY**

Plaintiffs respectively move the Court to enlarge the deadline for filing Plaintiff’s motion for summary judgment by one day, viz., from July 7, 2016 to July 8, 2016. In support of this motion, Plaintiffs state as follows:

- 1) As a result of unexpected recent developments, it has taken longer than anticipated to finalize the motion papers. Plaintiffs’ counsel has not yet been able to obtain signature pages for all of the declarations that are to be submitted in support of Plaintiffs’ motion for summary judgment. Furthermore, an additional day would allow Plaintiffs time to review the proposed final drafts of the briefing papers internally and (hopefully) eliminate any mistakes.
- 2) Counsel for Defendant William Taylor does not oppose this motion.
- 3) Lead counsel for Defendant Ken Albertelli could not be reached, but co-counsel Philip Murray advises that he does not oppose this motion.

Respectfully submitted,

THE PLAINTIFFS,
By their attorneys,

/s/ David D. Jensen
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Dated: July 7, 2016

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 7 July 2016.

/s/ David D. Jensen
David D. Jensen, Esq.