UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JEAN BATTY; EDWARD RUSSO; MATT WOLF; PAUL P. BARNETT; CRAIG VACCA; and COMMONWEALTH SECOND AMENDMENT, INC., Plaintiffs,))))) CIVIL ACTION NO) 1:15-cv-10238-FDS)
-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.)))

ASSENTED-TO MOTION TO ENLARGE THE DEADLINES FOR OPPOSING DISPOSITIVE MOTIONS

Plaintiffs respectively move the Court to enlarge all deadlines for filing oppositions to the parties' various dispositive motions (Doc. Nos. 50, 51 & 55) from July 28-29, 2016 to August 2, 2016. Counsel for Defendants Albertelli and Taylor assent to this request. In support of this motion, Plaintiffs state as follows:

1) Yesterday (July 26, 2016) a client of Plaintiffs' undersigned counsel (unrelated to the matter before the Court) received an Order to Show Cause that is returnable this upcoming Friday morning (July 29, 2016) in Albany, New York. Kelly v. N.Y. State Bd. of Elections, et al., no. 04170/16 (Supr. Ct. Albany Co.). This case is an election law case that concerns a challenge to a candidate's listing on the ballot in an upcoming state primary election. It would be either impossible or extremely impractical to extend the return date, given the time-sensitive nature of the case. Plaintiffs' counsel represented this client in a prior ballot-related challenge.

- 2) The requested enlargement will allow Plaintiffs' counsel two business days after the hearing to finalize opposition papers for the present matter essentially, the same amount of time "lost" due to this recent development.
- 3) Counsel for Defendants Ken Albertelli and William Taylor have assented to this motion.

Respectfully submitted,

THE PLAINTIFFS, By their attorneys,

/s/ David D. Jensen
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Dated: July 27, 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 27 July 2016.

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