

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

VALERIE KENNEDY,	:	CIVIL NO. 3:07CV0934(JCH)
PAULA ROSS	:	
<i>Plaintiffs,</i>	:	
	:	
v.	:	
	:	
STATE OF CONNECTICUT COMMISSION	:	
ON HUMAN RIGHTS & OPPORTUNITIES	:	
<i>Defendant</i>	:	August 17, 2009

MOTION FOR EXTENSION OF TIME REGARDING JOINT TRIAL MEMORANDUM

COMES NOW the defendant, State of Connecticut Commission on Human Rights and Opportunities, through counsel and pursuant to Local Rule 7(b), hereby requests an extension of time of thirty (30) days, extending the deadline for the filing of the Joint Trial Memorandum to September 30, 2009. In support of this motion, the defendant represents as follows:

1. The dispositive motion deadline in the instant matter was July 30, 2009. No dispositive motion was filed due to the complexity of the issues.
2. The parties' 26(f) Report filed states that a Joint Trial Memorandum will be filed 30 days after a ruling on a Motion for Summary Judgment, or 30 days after the expiration of the dispositive motion deadline.
3. The undersigned reports to the court that the parties have been actively engaged in resolving the case without the unnecessary need for the expenditure of the Court's time and resources. Settlement discussions are ongoing.
4. Plaintiff's counsel has communicated that she may have to file a motion to withdraw her appearance. Until that issue is resolved, the case cannot proceed

towards trial. If such a motion were to be granted, additional time will be necessary for new counsel to learn the case and confer about the joint trial memorandum.

5. This case involves a vast number of complex issues and that a significant number of exhibits and witnesses will be produced at trial. It is anticipated that the trial would take several weeks of testimony. Respectfully, additional time is required to prepare the witness and exhibit lists.
6. In the immediate time frame counsel has been involved with responding to a large number of discovery requests in the matter of Orr v. Wisner, 3:08CV0953(JCH) and in preparing and defending a large number of depositions in that matter as well. The undersigned also has discovery requests that have to be addressed in the state court matter of Wagner v. Board of Trustees for Connecticut State University System, HHD-CV-08-5023775 S and a brief due on August 24, 2009 in the matter of Charette v. DSS, 3:01CV1927(WWE) following a remand from the Second Circuit Court of Appeals.
7. The plaintiffs will not be prejudiced by the delay.
8. Pursuant to Local Rule 7(b), the undersigned has consulted with plaintiffs' counsel, Barbara Collins, Esq., and she has NO OBJECTION to this motion.
9. This is the defendant's first request for an extension of time regarding the Joint Trial Memorandum.

WHEREFORE, the defendant respectfully requests an extension of time of thirty (30) days to and including September 30, 2009 in which to file the Joint Trial Memorandum.

DEFENDANT

RICHARD BLUMENTHAL
ATTORNEY GENERAL

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CERTIFICATION

I hereby certify that on August 17, 2009 a copy of the foregoing Motion for Extension of Time Regarding the Joint Trial Memorandum was filed electronically. Notice of this filing was sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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