

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

**SHANA SANDLER,**

*Plaintiff*

v.

**MIA CALCAGNI *et al*,**

*Defendants*

Case No. 1:07-cv-00029

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**PLAINTIFF’S MOTION TO EXTEND THE TIME TO  
RESPOND TO DEFENDANTS RALPH AND MAUREEN CALCAGNI’S  
MOTION FOR SUMMARY JUDGMENT**

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Plaintiff Shana Sandler moves, pursuant to Fed R. Civ. P. 6(b), to enlarge the time to respond to Defendants Ralph and Maureen Calcagni’s Motion for Summary Judgment (Docket No. 126) for ten days following a ruling on Plaintiff’s motion to strike Defendants’ summary judgment motion (Docket No. 135).

Pending before this Court are Defendants’ motion for summary judgment and Plaintiff’s motion to strike this pleading. Plaintiff’s motion to strike is based on the fact that the motion is untimely – filed more than a month past the Court’s deadline for dispositive motions – and filed without prior leave of court. A decision granting Plaintiff’s motion to strike will eliminate the need for a response to Defendant’s motion for summary judgment and avoid a potentially unnecessarily pleading. Because a decision on Plaintiff’s motion to strike would be dispositive of Defendants’ motion, Plaintiff requests that the Court extend the period for Plaintiff to respond to this motion to ten (10) days following a decision on Plaintiff’s motion to strike.

WHEREFORE, Plaintiff moves to extend the time for her to respond to Defendants Ralph and Maureen Calcagni's Motion for Summary Judgment to ten (10) days following a ruling on Plaintiff's motion to strike Defendants' late summary judgment motion.

Dated at Bangor, Maine, this 25<sup>th</sup> day of April, 2008.

PLAINTIFF, Shana Sandler,

By /s/ Bernard J. Kubetz  
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### CERTIFICATE OF SERVICE

I, Bernard J. Kubetz, hereby certify that on April 25, 2008, I electronically filed the foregoing Plaintiff's Motion to Extend the Time to Respond to Defendants Ralph and Maureen Calcagni's Motion for Summary Judgment with the Clerk of the United States District Court using the CM/ECF system, which will send notification of such filing to the following:

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