SANDLER v. CALCAGNI et al Doc. 4

## UNITED STATES DISTRICT COURT DISTRICT OF MAINE

SHANA SANDLER,	)	
	)	
Plaintiff	)	
	)	
v.	)	
	)	
MIA CALCAGNI,	)	Case No. 07-CV-00029-GZS
RALPH CALCAGNI,	)	
MAUREEN CALCAGNI,	)	
PETER MARS, and	)	
BOOKSURGE, LLC,	)	
	)	
Defendants	)	

## DEFENDANTS RALPH CALCAGNI, MAUREEN CALCAGNI AND MIA CALCAGNI'S MOTION TO ENLARGE DEADLINE TO SUBMIT INITIAL DISCLOSURE

Paul W. Chaiken, Esq., on behalf of Bruce C. Mallonee, Esq., counsel for Defendants Ralph Calcagni, Maureen Calcagni, and Mia Calcagni, moves for an enlargement of time for these Defendants to submit their initial disclosure. The present deadline is September 11, 2007. Mr. Mallonee has been the only attorney working on his case. He was called out of town on September 5, 2007 for a family medical emergency. He does not expect to return to the office until September 14, 2007, although that is extremely tentative. Upon his return, he will have to review documents recently received from the client, and then prepare the initial disclosure as required by F.Civ.P.26(a)(1).

I have alerted counsel for the other parties to this request. None object.

WHEREFORE, an order is sought enlarging the time for Defendants Calcagni to submit their initial disclosure to September 24, 2007.

Dated: September 7, 2007 /s/ Paul W. Chaiken

Paul W. Chaiken, Esq. RUDMAN & WINCHELL

Attorney for Defendants Mia Calcagni, Ralph

Calcagni, and Maureen Calcagni 84 Harlow Street, P.O. Box 1401 Bangor, Maine 04402-1401 Telephone: (207) 947-4501 pchaiken@rudman-winchell.com

## **CERTIFICATE OF SERVICE**

I, Paul W. Chaiken, Esq., hereby certify that on September 7, 2007, I filed the foregoing Motion for Enlargement of Deadline to File Initial Disclosure with the Clerk of the United States District Court using the CM/ECF system, which will send notification electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Paul W. Chaiken
Paul W. Chaiken, Esq.
RUDMAN & WINCHELL
Attorney for Defendants Mia Calcagni, Ralph
Calcagni, and Maureen Calcagni
84 Harlow Street, P.O. Box 1401
Bangor, Maine 04402-1401
Telephone: (207) 947-4501

pchaiken@rudman-winchell.com