

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

SHANA SANDLER,)	
)	
Plaintiff)	Case No. 1:07-cv-00029
)	
vs.)	
)	
MIA CALCAGNI, RALPH CALCAGNI,)	
MAUREEN CALCAGNI, PETER)	
MARS, and BOOKSURGE, LLC,)	
)	
Defendants)	
)	

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO FILE LIABILITY EXPERT WITNESS DESIGNATIONS,
WITH INCORPORATED MEMORANDUM**

Plaintiff Shana Sandler hereby moves for an extension of the deadline in which to designate expert liability witnesses to and including thirty (30) days after the taking of the last of Defendants' depositions.

At the insistence of defense counsel, the Defendants are not being made available for depositions until November. The depositions of Defendants Mia Calcagni, Ralph Calcagni, Maureen Calcagni and Peter Mars are scheduled to take place on November 5 and 6, 2007. The deposition of Defendant BookSurge, LLC is tentatively scheduled for November 27, 2007. Until the depositions of Defendants are completed, Plaintiff cannot intelligently determine the issues as to which liability experts are needed and then identify and designate such experts.

WHEREFORE, Plaintiff requests an extension to designate experts to and including thirty (30) days after the completion of the Booksurge, LLC deposition.

Dated at Bangor, Maine, this 17th day of October, 2007.

PLAINTIFF, Shana Sandler,

BY /s/ Bernard J. Kubetz
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CERTIFICATE OF SERVICE

I, Bernard J. Kubetz, hereby certify that on October 17, 2007, I electronically filed the foregoing Motion for Extension of Time to Designate Experts 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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