

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHRISTINE VARAD,)	
)	
Plaintiff,)	
)	C.A. No. 06 CA 11370 MLW
v.)	
)	
REED ELSEVIER INCORPORATED,)	
d/b/a/ Lexis Nexis, LexisNexis Risk and)	
Information Analytics Group,)	
)	
Defendant.)	

**DEFENDANT’S STATEMENT REGARDING DEADLINE
FOR OPPOSING PLAINTIFF’S MOTION TO COMPEL**

Defendant Reed Elsevier Inc. (“Reed”) hereby submits this statement regarding the deadline for Reed to Oppose plaintiff Christine Varad’s (“Plaintiff”) LR D. Mass 37.1 Motion to Compel Production of Documents Pursuant to Fed. R. Civ. P. 34 and .37(a) (the “Motion”). Plaintiff’s Motion is dated May 16, 2007, with an attached Certificate of Service certifying that the Motion was served via United States mail to counsel for Reed on that date. The Motion, however, was not caused to be mailed until May 21, 2007, and did not arrive at this office until May 22, 2007. A true and accurate copy of the date-stamped envelope that enclosed the Motion is attached hereto as Exhibit A. Reed’s opposition to the Motion is therefore due to be filed on or before June 4, 2007.

REED ELSEVIER INC.
By its attorneys,

/s/ Kristin M. Cataldo
T. Christopher Donnelly (BBO #129930)
Kristin M. Cataldo (BBO #654033)
Donnelly, Conroy & Gelhaar, LLP
One Beacon Street, 33rd Floor
Boston, Massachusetts 02108
(617) 720-2880

Dated: May 23, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 2007, I caused a copy of the foregoing to be served on the following by regular mail:

Christine M. Varad
P.O. Box 583
Milton, MA 02186

/s/ Kristin M. Cataldo
Kristin M. Cataldo