

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 07-CV-11807 RGS

WAREHAM FREE LIBRARY, INC. and
PRISCILLA PORTER, MARY NYMAN, HAZEL TABER,
MICHELLE BAUM, SANDRA WHEELER, JOHN LANCI,
MARTHA MAGUIRE, YELENA FARIOLI-BEAUPRE, and
DIANE LAZARUS, Individually and As Trustees of Wareham
Free Library, Inc.

Plaintiffs / Defendants in Counterclaim /
Third Party Plaintiffs

v.

THE TOWN OF WAREHAM

Defendant / Plaintiff in Counterclaim

and

BRENDA ECKSTROM, BRUCE SAUVAGEAU, JOHN
CRONAN, JAMES POTTER, and M. JANE DONAHUE,
Individually and As Members of The Board of Selectmen of
Wareham

Defendants

v.

FRIENDS OF THE WAREHAM FREE LIBRARY, INC.,

Defendant in Counterclaim

v.

MASSACHUSETTS INTERLOCAL INSURANCE
ASSOCIATION

Third Party Defendant

PLAINTIFFS' (UNOPPOSED) EMERGENCY MOTION
FOR AN EXTENSION TO FILE A MEMORANDUM CONCERNING
THE BASIS FOR PLAINTIFFS' FEDERAL CLAIM

At the Scheduling Conference on January 23, 2008, the Court ordered Plaintiffs to file a memorandum within three weeks of the Conference advising the Court of the basis for Plaintiffs' Federal claim in this case. Plaintiffs respectfully request a short, six-day extension for filing said memorandum to next Tuesday, February 19, 2008.

In support, Plaintiffs state that their undersigned counsel had a heavy litigation schedule in the past three weeks, including a trial of another matter in the Massachusetts Bristol County Superior Court, Docket No. BRCV2005-01382, and did not have sufficient time to prepare said memorandum. The requested one-week extension will not prejudice rights of any parties in this action.

In further support, Plaintiffs state that this motion has been assented to by Defendant in Counterclaim Friends of the Wareham Free Library, Inc. and Third Party Defendant Massachusetts Interlocal Insurance Association. Plaintiffs' undersigned counsel was also advised by counsel for Defendants Town of Wareham and the Board of Selectmen that said Defendants do not assent to this motion, but do not oppose it either.

For all these reasons, Plaintiffs respectfully request that this Motion be allowed.

Respectfully submitted,

PLAINTIFFS /
DEFENDANTS IN COUNTERCLAIM /
THIRD PARTY PLAINTIFFS

By Their Attorneys,

/ S / Timour Zoubaidouline

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Dated: February 13, 2008

CERTIFICATE OF SERVICE

In accordance with the Electronic Case Filing (“ECF”) Administrative Procedures of the United States District Court for the District of Massachusetts, I, Timour Zoubaidouline, hereby certify that the foregoing document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and that paper copies will be sent to those indicated as non-registered participants by first class mail on February 13, 2008.

/ S / Timour Zoubaidouline

TIMOUR ZOUBAIDOULINE, BBO # 656212