

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 07-CV-11807 RGS

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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 PORTER, and M. JANE DONAHUE,  
Individually and As Members of The Board of Selectman  
of Wareham,

Defendants,

v.

FRIENDS OF THE WAREHAM FREE LIBRARY, INC. and  
THE WAREHAM LIBRARY FOUNDATION, INC.,

Defendants in Counterclaim,

v.

MASSACHUSETTS INTERLOCAL INSURANCE ASSOC.

Third Party Defendant.

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**JOINT MOTION TO EXTEND DISCOVERY PERIOD**

NOW COME ALL PARTIES to the action and jointly move, pursuant to Local Rule 26.2(B), that the deadlines for taking of fact depositions, completing and exchanging expert disclosures, and filing and serving motions for summary judgment each be extended by approximately two months, as described in more detail below.

In support of this motion, the parties state that due to the challenges associated with scheduling depositions for each of the individually named parties (and, in the case of organizations, individuals designated as Rule 30(b)(6) deponents for those parties) on dates and at times that are convenient to all counsel of record, the parties agree that they will be able to conclude all such fact depositions by the end of March 2009. Accordingly, the parties jointly request that the deadlines established by this Court's order of June 18, 2008 be enlarged as follows:

- Fact depositions completed by March 31, 2009;
- Expert disclosures must be completed and exchanged by May 15, 2009; and
- Any motion for summary judgment must be filed by June 19, 2009.

Respectfully submitted,

Plaintiffs/Defendants in Counterclaim  
Third Party Plaintiffs  
By their attorneys,

Plaintiff in Counterclaim  
The Town of Wareham  
By its attorneys,

/s/ Philip N. Beauregard  
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Defendants,  
Officially and Individually

By their attorneys,

/s/ Peter E. Montgomery

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Defendant in Counterclaim  
Friends of the Wareham Free Library, Inc.

By its attorney,

/s/ Thomas J. Gallitano

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Third Party Defendant  
Massachusetts Interlocal Insurance Association  
By its attorney,

/s/ Arthur E. Maravelis

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Dated: January 21, 2009