

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS BAY
TRANSPORTATION AUTHORITY,

Plaintiff,

v.

ZACK ANDERSON, RJ RYAN,
ALESSANDRO CHIESA, AND THE
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Defendants.

CIVIL ACTION NO. 08-11364-GAO

**MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
AUGUST 14, 2008 DISCOVERY ORDER**

Defendants Anderson, Ryan and Chiesa (“students”) hereby move for a short extension of time to respond to the Court’s August 14, 2008 order requiring production or responses to particular document requests submitted by the plaintiff no later than 1:00 PT/4:00 ET today, August 15, 2008.

This extension is necessary because the students’ lead counsel, Jennifer Granick, has encountered numerous travel-related complications that have delayed her return to San Francisco and rendered her unable to review the response to the document requests underlying the Court’s order. Declaration of Kurt Opsahl (“Opsahl Decl.”) ¶ 3. Ms. Granick’s flight is expected to land in San Francisco at approximately 12:00 PT/3:00 ET this afternoon, and she will be unable to review the response in consultation with her colleagues until late afternoon ET today, after the Court-ordered discovery deadline has passed. Opsahl Decl. ¶ 4.

Counsel for the students have requested opposing counsel’s consent to an

extension of the deadline, but opposing counsel has not responded. Opsahl Decl. ¶ 5. To permit Ms. Granick a reasonable opportunity to review the response to the discovery request and confer with her colleagues, we respectfully request that the Court extend the discovery deadline to 4:00 PT/8:00 ET on August 16, 2008.

Respectfully submitted,

/s/ John Reinstein

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