

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JEFFREY FOWLER, PAUL WHOOTEN, MICHAEL  
TURNER, and MICHAEL FITZPATRICK on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

THOMAS TURCO,  
Commissioner of Massachusetts Department  
of Correction, in his official capacity, and  
MASSACHUSETTS PARTNERSHIP FOR  
CORRECTIONAL HEALTHCARE, INC.,

Defendants.

C.A. NO. 1:15CV12298-NMG

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

All parties bring this joint motion to extend the deadline for fact discovery by 120 days, from December 31, 2016 to May 1, 2017, and to extend the remaining deadlines in the Court's Scheduling Order.

Pursuant to the Scheduling Order entered in this matter on March 16, 2016, responses to written discovery requests were due by October 31, 2016, and all fact discovery was to be concluded by December 31, 2016. The parties negotiated the terms of a protective order, which was entered by the Court on November 14, 2016. Defendants have since begun their document production, but they have more to produce, and objections have been raised that will necessitate discussion among the parties and possible court intervention concerning the scope of discovery. The noticing of depositions has been delayed, in light of the expectation that most of the documents requested remain to be produced.

*Motion allowed. JGM/Gorton, USDJ 1/14/17*