

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN W. GRIFFITHS, on behalf )  
of himself and all others similarly )  
situated, )  
) )  
Plaintiff, )  
v. )  
) )  
AVIVA LONDON ASSIGNMENT )  
CORPORATION, AVIVA LIFE INSURANCE )  
COMPANY, AVIVA INTERNATIONAL )  
INSURANCE LTD, f/k/a CGU )  
INTERNATIONAL INSURANCE, plc, )  
ATHENE HOLDING, LTD, )  
ATHENE LONDON ASSIGNMENT )  
CORPORATION and )  
ATHENE ANNUITY AND LIFE COMPANY, )  
) )  
Defendants. )  
\_\_\_\_\_ )

Civil Action No. 15-cv-13022-NMG

JURY TRIAL DEMANDED

**PLAINTIFF’S MOTION TO ENLARGE TIME TO SUBMIT  
SETTLEMENT PROPOSAL AND TO EXTEND TIME FOR DEFENDANTS TO  
RESPOND ACCORDINGLY**

Plaintiff John W. Griffiths hereby moves this Court to extend the time within which Plaintiff may submit a settlement proposal to Defendants pursuant to L.R. 16.1(C) from June 30, 2016 to and including September 30, 2016, and to extend the time within which Defendants may respond thereto until October 14, 2016, where, in light of the nature of the case (a proposed class action) and the fact that the parties have yet to engage in discovery, Plaintiff is unable to formulate a demand at this point. Plaintiff anticipates that, after receiving initial disclosures and engaging in discovery over the next few months, Plaintiff will be in a position to make an initial demand, even though that demand will be issued after the Rule 16 conference in this matter.

*Motion allowed. s/ M. Gorton, USDJ 7/14/16*