UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 16-CV-10440-NMG

KATHRYN S. GOUIN, Plaintiff,

VS.

NOLAN ASSOCIATES, LLC d/b/a BOSTON HARBOR CRUISES Defendant

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

Now come the Parties in the above-captioned matter and, respectfully move this Honorable Court to extend all discovery deadlines by three [3] months as set forth below and to approve April 4, 2017 as the new date for Mediation.

In support of their motion, the Parties state the following:

- 1. This is a personal injury action where the Plaintiff, Kathryn Gouin, alleges that she was injured onboard the Defendant's vessel, M/V CODZILLA.
- 2. The Parties have exchanged written discovery.
- 3. The Parties are in the process of scheduling depositions, including depositions of the Plaintiff and the Defendant's personnel.
- 4. The Defendant is still awaiting receipt of the Plaintiff's medical records from her primary care physician which pre-date her alleged injury on August 3, 2014. The Defendant intends to notice her deposition for a date after receipt of said records.
- 5. Fact discovery is scheduled to end on January 31, 2017.
- Mediation is presently scheduled on February 1, 2017 before Magistrate Judge
 Marianne Bowler. Defense counsel will be unable to attend Mediation on that date