

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JANE DOE,)	
SUZETTE LINDGREN,)	
ANDREW MOYER,)	
on behalf of themselves and all others)	
similarly situated, and)	
MASSACHUSETTS COALITION)	
FOR THE HOMELESS, and)	
CENTRAL MASSACHUSETTS)	
HOUSING ALLIANCE,)	
)	CIVIL ACTION NO.:
Plaintiffs,)	06-40133-FDS
)	
v.)	
)	
CITY OF WORCESTER,)	
WORCESTER PUBLIC LIBRARY, and)	
WORCESTER PUBLIC LIBRARY)	
BOARD OF DIRECTORS,)	
)	
Defendants.)	

JOINT MOTION TO CONTINUE SCHEDULING CONFERENCE

The parties in this action, through counsel, hereby jointly move the Court to enter an order continuing the scheduling conference until October 27, 2006 at 2:30 p.m. In support of this Motion, the parties jointly state as follows:

1. The Court has scheduled a scheduling conference in this matter for September 29, 2006, at 11:15 a.m.
2. The parties have been engaging in settlement discussions over the last few weeks. The parties would like to continue said discussions and attempt to resolve this matter prior to expending the attorney time necessary to prepare for and attend a scheduling conference.

3. Furthermore, one of the undersigned counsel in this matter has pre-existing plans to be out of Massachusetts on a work-related matter on the date of the currently schedule conference.

4. Therefore, the parties respectfully request that the Court continue the scheduling conference so that the parties at this juncture can direct their efforts to settling the matter and can avoid spending additional attorney time and costs that might jeopardize the anticipated settlement.

WHEREFORE the parties respectfully request the Court to continue the scheduling conference until October 27, 2006 at 2:30 p.m.

Defendants City of Worcester, Worcester
Public Library, and Worcester Public Library
Board of Directors,
By its attorneys,

/s/ Janet J. McGuiggan, Esq.
David M. Moore, Esq.
Janet J. McGuiggan, Esq.
City Hall, Room 301
455 Main Street
Worcester, Massachusetts 01608
(508) 799-1161
Date: September 11, 2006

Plaintiffs Jane Doe, Suzette Lindgren, Andrew
Moyer, Massachusetts Coalition for the
Homeless and Central Massachusetts Housing
Alliance,
By their attorneys,

/s/ Kate J. Fitzpatrick, Esq.
Jonathan L. Mannina, Esq.
Kate J. Fitzpatrick, Esq.
Legal Assistance Corporation
of Central Massachusetts
405 Main Street, Fourth Floor
Worcester, Massachusetts 01608
(508) 752-3718
Date: September 11, 2006

/s/ John Reinstein, Esq.
John Reinstein, Esq.
American Civil Liberties Union
of Massachusetts
211 Congress Street, Suite 300
Boston, Massachusetts 02110
(617) 482-3170
Date: September 11, 2006