

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

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TOWN OF WOLFEBORO

Plaintiff,

v.

WRIGHT-PIERCE,

Defendant.

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Civil No. 1:12-cv-00130-JD

**WOLFEBORO'S ASSENTED-TO MOTION TO EXTEND THE DEADLINE FOR  
DISCLOSURE OF TRIAL EXHIBITS**

Pursuant to Local Rule 7.2, Wolfeboro respectfully move this Honorable Court to extend the deadline for the Parties to disclosure their list of trial exhibits, which is required to be included in the Pre-Trial Statement pursuant to Rule 26(a)(3)(iii) and Local Rule 16.2(a)(5). The Parties will still file their respective Pre-trial Statements and all other required documents under Local Rule 16.2 on March 18, 2014; however, they seek a three (3) day extension until Friday, March 21 to file their list of trial exhibits.

As grounds for this Motion, Wolfeboro states that the volume of documents in this case is extraordinary (totaling over several hundred thousand pages), that there are currently 335 exhibits which have been marked at depositions, and that the parties are still engaged in conducting depositions of three remaining third party witnesses, whose depositions have previously been continued due to inclement weather and scheduling issues.

Wolfeboro states that an extension would be appropriate to allow the parties additional time to identify appropriate trial exhibits. The parties are currently working in good faith to prepare their Pre-Trial Statements, Motions in Limine, and other required filings, which will be filed on Tuesday, March 18, 2014. An extension of three days to file their list of trial exhibits

will not result in the continuance of any hearing, conference, or trial, or in the filing of the Parties' Rule 16.2(d) objections which are due on March 27, 2014.

WHEREFORE, Wolfeboro respectfully requests that this Court grant the parties an extension until Friday, March 21, 2014 to file their exhibit lists. The undersigned counsel has conferred with counsel for Wright-Pierce, which has represented that it assents to the relief requested in this Motion.

Respectfully submitted,

**The Town of Wolfeboro,**

By its attorneys,

/s/ Seth M. Pasakarnis

**Hinckley, Allen & Snyder LLP**

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Date: March 17, 2014

**CERTIFICATE OF SERVICE**

I, Seth M. Pasakarnis, Esq., hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: March 17, 2014

/s/ Seth M. Pasakarnis

Seth M. Pasakarnis