

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,
Plaintiff

v.

ROBERT F. STROM as the Finance Director of
THE CITY OF CRANSTON,
THE CITY OF CRANSTON, and
COL. MICHAEL J. WINQUIST in his official
capacity as Chief of the CRANSTON POLICE
DEPARTMENT
Defendants

C.A. No. 15-525

PLAINTIFF'S MOTION TO EXTEND THE DISCOVERY DEADLINES

Plaintiff Edward A. Caniglia hereby moves to extend the discovery deadlines by six months on the grounds that discovery was stayed during almost the entire period provided for fact discovery under the existing scheduling order.

There has been no discovery in this case. On January 7, 2016, the Court entered the scheduling order setting the close of fact discovery for June 30, 2016. However, the Court stayed discovery on January 29, 2016 pending its decision on Plaintiff's Motion for Partial Summary Judgment in the "Richer v. Parmalee" case, C.A. No. 15-162. The Court issued that Decision on June 1st. In addition, Plaintiff anticipates filing a motion to amend the complaint to address points the Court made in that decision.

Accordingly, Plaintiff requests that the Court enter a new scheduling order with the following deadlines:

All factual discovery will be closed by December 31, 2016

All expert discovery will be closed by April 1, 2017

Plaintiff shall make his expert witness disclosures as required by F.R.Civ.P. 26(a)(2) by January 31, 2017

Defendants shall make their expert witness disclosures as required by F.R.Civ.P. 26(a)(2) by March 2, 2017

Respectfully submitted,

Edward A. Caniglia

By his attorneys,

/s/ Thomas W. Lyons

Thomas W. Lyons #2946

Rhiannon S. Huffman #8642

RHODE ISLAND AFFILIATE,

AMERICAN CIVIL LIBERTIES UNION

Strauss, Factor, Laing & Lyons

One Davol Square, Suite 305

Providence, RI 02903

(401) 456-0700

tlyons@straussfactor.com

CERTIFICATION

I hereby certify that on August 2, 2016 a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons