

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,
Plaintiff

v.

C.A. No. 15-525-M-LDA

ROBERT F. STROM, as the Finance
Director of the CITY OF CRANSTON, the
CITY OF CRANSTON, et al
Defendants

**THE PARTIES' JOINT MOTION TO
EXTEND PRE-TRIAL DATES**

Now come the Parties, and move for an extension of some pre-trial dates for an additional ninety (90) days. The factual discovery closure date is currently January 8, 2018. The expert discovery closure date is currently April 9, 2018. Defendants and Plaintiff request that the factual discovery date be extended by an additional ninety (90) days, and that all other pre-trial dates be extended in conformity with the continued factual discovery closure date.

The reason for Defendants and Plaintiff's extension is because of the amount of time required for Defendants to complete the responses to each of Plaintiff's six sets of interrogatories directed to the six defendants added in Plaintiff's Amended Complaint. For this reason, the extra time is necessary to schedule and complete the necessary factual discovery and to complete expert discovery

WHEREFORE, Defendants and Plaintiff respectfully request that the remaining pre-trial dates be extended an additional ninety (90) days. Specifically, it is requested that Factual Discovery to close on **April 8, 2018**; Expert Discovery to close by **July 8, 2018**; and Dispositive Motions to be due by **August 6, 2018**.

Plaintiff,
By his Attorneys,

Defendants,
By their Attorneys,

/s/Rhiannon S. Huffman

Rhiannon S. Huffman #8642
Thomas W. Lyons #2946
Strauss, Factor, Laing & Lyons
One Davol Square, Suite 305
Providence, RI 02903
401-456-0700
rhuffman@straussfactor.com

/s/ Marc DeSisto

Marc DeSisto, Esq.
DESISTO LAW LLC
60 Ship St.
Providence, RI 02903
401-272-4442
marc@desistolaw.com

CERTIFICATION OF SERVICE

I hereby certify that the within document has been electronically filed with the Court on October 6, 2017 and is available for viewing and downloading from the ECF system.

Rhiannon S. Huffman, Esq.
rhuffman@straussfactor.com

Thomas W. Lyons, III, Esq.
tlyons@straussfactor.com

Patrick K. Cunningham, Esq.
patrick@desistolaw.com

/s/ Marc DeSisto

Marc DeSisto