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

JOINT MOTION TO EXTEND PRE-TRIAL DATES

Now come the Plaintiff and Defendants and jointly move for an extension of all pre-trial dates for an additional ninety days. The factual discovery closure date is April 09, 2018. The parties request that the factual discovery disclosure date be extended by an additional ninety days, and that all other pre-trial dates be extended in conformity with the continued factual discovery closure date. Plaintiff and his wife are out of the state until early May. In addition, the parties will have to complete multiple depositions of Cranston Police officers. As a result, the parties request that all pre-trial deadlines be extended an additional ninety days.

Plaintiff, By his attorneys Defendants, By their Attorneys,

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CERTIFICATION OF SERVICE

I hereby certify that the within document has been electronically filed with the Court on this 19th day of March 2018 and is available for viewing and downloading from the ECF system.

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/s/ Patrick K. Cunningham
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