## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

## EDWARD A. CANIGLIA,

 Plaintiffv. : :
$\square$ v. : C.A. No. 15-525

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

Defendants

## FINAL JOINT MOTION TO EXTEND THE DISCOVERY DEADLINES

The parties hereby move jointly to extend the discovery deadlines by approximately one month. Accordingly, Plaintiff requests that the Court enter a new scheduling order with the following deadlines:

All factual discovery will be closed by August 17, 2018.
Plaintiff shall make his expert witness disclosures, if any, as required by F.R.Civ.P. 26(a)(2) by September 17, 2018.

Defendants shall make their expert witness disclosures, if any, as required by F.R.Civ.P. 26(a)(2) by October 17, 2018.

All expert discovery will be closed by November 17, 2018.
All dispositive motions shall be filed by December 17, 2018, or if no dispositive motions are filed, the parties shall file pretrial memoranda as set forth in the Court's January 7, 2016 Scheduling Order.

Respectfully submitted,
EDWARD 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

## DEFENDANTS

By their attorneys,
/s/ Marc DeSisto
Marc Desisto \#2757
DeSisto Law Offices
60 Ship Street
Providence, RI 20903

## CERTIFICATION

I hereby certify that on June 15, 2018, 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

