

DOCKET NO. HHD-CV22-6152239-S	:	SUPERIOR COURT
	:	
JOHN BROWN; LISA FAGAN; MICHAEL FAGAN; JEFFREY FORDE; JOSHUA PAWELEK; AND JOHN STOEHR, as individuals and on behalf of all others similarly situated, <i>Plaintiffs;</i>	:	J.D. OF HARTFORD
	:	
v.	:	
	:	
HARTFORD HEALTHCARE CORPORATION <i>Defendant</i>	:	MARCH 18, 2022

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO PLEAD**

Pursuant to Connecticut Practice Book §§ 10-6 *et seq.*, Defendant Hartford HealthCare Corporation (“Hartford HealthCare”) respectfully moves the Court for an extension of time of thirty (30) days, through and including May 16, 2022, in which to answer, move or otherwise respond to the Complaint of Plaintiffs John Brown, Lisa Fagan, Michael Fagan, Jeffrey Forde, Joshua Pawelek, and John Stoehr (“Plaintiffs”), which bears a return date of March 15, 2022 [Dkt. No. 100.31]. In support of this motion, Hartford HealthCare states as follows:

1. Hartford HealthCare makes this motion in order to allow adequate time to conduct the factual and legal investigation necessary to respond appropriately to the Complaint.
2. This is Hartford HealthCare’s first request for an extension of time to file a responsive pleading to Plaintiffs’ Complaint. The time for filing a responsive pleading has not yet expired.
3. This case has not been assigned for trial and the Court’s granting of this motion will neither cause undue delay in the progression of this case nor cause prejudice to any party involved.

ORAL ARGUMENT NOT REQUESTED

WHEREFORE, Hartford HealthCare respectfully requests that the Court grant an extension of time of thirty (30) days, through and including May 16, 2022, for Hartford HealthCare to answer, move or otherwise respond to Plaintiffs' Complaint, together with such other and further relief that the Court deems proper.

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**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that on March 18, 2022 a copy of the foregoing was or will immediately be mailed or electronically delivered to counsel of record as follows:

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