UNITED STATES DISTRICT COURT

**FOR THE**

**DISTRICT OF MASSACHUSETTS**

Anne Anderson, et al.,

Plaintiffs,

Civil Action No. 82-1672-S

v.

Cryovac, Inc., et al.,

Defendants.

**PLAINTIFF ANNE ANDERSON’S**

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff Anne Anderson moves this Court for an extension of time, until July 29, 2011, in which to answer Defendant W.R. Grace & Co.’s Third Set of Interrogatories to Plaintiff Anne Anderson (“Interrogatories”). In support of this motion, Plaintiff states:

1. Under Rule 33(b) of the Federal Rules of Civil Procedure, Plaintiff’s answers to the Interrogatories are due within 30 days of service, or July 22, 2011.
2. Plaintiff presently is out of town and will not return until July 19, 2011, and she will be unable to prepare adequate answers to the Interrogatories by the due date.
3. Plaintiff believes a one-week extension of time, until July 29, 2011, would permit her to provide responsive answers to the Interrogatories and would not delay trial.
4. The Court has ordered that discovery be completed by July 25, 2011.
5. Under Rule 29(b) of the Federal Rules of Civil Procedure, if an extension of time for discovery would interfere with the time set for completing discovery, approval of the Court is required.

Therefore, Plaintiff requests the Court to order that the due date for answers to the Interrogatories be extended to July 29, 2011.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

Counsel for Plaintiffs certifies that she has conferred with counsel for Defendant W.R. Grace & Co. and counsel for Defendant Beatrice Foods Co. and that they do not object to the extension of time requested in this motion.

Dated: June 23, 2011

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the above unopposed motion for extension of time was served by mail on June 23, 2011, on the following:

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