

AC XXXXX

APPELLATE COURT

JOHN Q. PUBLIC

STATE OF CONNECTICUT

v.

JANE M. DOE

DATE

MOTION FOR EXTENSION OF TIME (P.B. §§ 66-1, 66-2, 66-3)

The plaintiff-appellant, through the undersigned counsel, hereby moves for an extension of time of twenty-one (21) days, until June x, 20xx, in which to file his brief. In support of this motion, the undersigned represents as follows:

I. Brief History.

Judgment was entered on January 2, 2019, and this appeal immediately followed. Transcript was delivered on March 29, 2019; under the Appellate Rules of Procedure the appellant's brief is due May 13, 2014.

II. Specific Facts.

Although the transcript was delivered promptly, it is voluminous (1,500 pages). Because the undersigned counsel also has two other appeals, filed prior to this one (*Brodie v. Sandy*, AC 12355, appellant's brief due May 20, 2019, which will be filed on time; and *Kirby v. Romo*, AC 12366, appellant's brief due May 31, 2019, which is currently being researched, with a draft of the statement of facts already completed), he has not had sufficient time to complete the reading of the transcript in this case. Additionally, undersigned counsel has been out of the office with the flu for the past two weeks, and is now caring for his newborn child that also contracted the flu. The writing of the brief has not yet begun, but it is estimated that the brief will be filed within the time requested, i.e. on or before June x, 20xx. COUNSEL FOR THE DEFENDANT-APPELLEE CONSENTS TO THE GRANTING OF THIS MOTION.

III. Legal Grounds.

The appellant relies on Practice Book § 66-1, which permits the chief clerk to grant motions for extension of time upon a showing of good cause. The specific facts demonstrate good cause for a twenty-one (21) day extension of time.

PLAINTIFF-APPELLANT

BY: _____/S/
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CERTIFICATION

Pursuant to P.B. §§ 62-7 and 66-3, it is hereby certified that a copy of the forgoing was sent electronically this 19th day of June, 2019, to: Attorney E.F. Gee (attorney for the defendant-appellee, Jane Doe), Juris No. 000003, 2 Oak Street, Town, CT 06113, (860) 987-6543, email: efgee@e-mail.com. It is also certified that this document has been redacted or does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order, or case law. It is also certified that this document complies with all applicable rules of appellate procedure.

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