

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 89-30201-F

ALICE L. WARREN, ADMINISTRATRIX)
OF THE ESTATE OF JOHN H. WARREN,)
DECEASED,)
 Plaintiff)
VS.)
THE DOW CHEMICAL COMPANY,)
THE B.F. GOODRICH COMPANY,)
UNION CARBIDE COMPANY and)
CONTINENTIAL OIL COMPANY,)
 Defendants)

BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR EXTENSION
OF TIME IN WHICH TO FILE ANSWERS TO INTERROGATORIES

The plaintiff states as follows in support of her motion:

1. On December 21, 1990, the plaintiff, through her attorney, received three sets of interrogatories propounded by defendants, Dow Chemical Company, Union Carbide Company and Continental Oil Company. The plaintiff is required under Fed. R. Civ. P., Rule 33 to furnish answers to these interrogatories within thirty (30) days or by January 22, 1991.
2. The interrogatories served on the plaintiff request a great deal of detailed information which will take a substantial amount of time to assemble.
3. The thirty (30) day extension sought will not delay these proceedings or result in any prejudice to any party.
4. Attorney Sharon R. Burger, counsel for defendants, Dow Chemical Company, Union Carbide Company and Continental Oil Company, has assented to the allowance of this motion.

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