

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

SELINA SOULE, ET AL.	:	
Plaintiffs	:	
	:	CIVIL ACTION NO.: 3:20-cv-00201 (RNC)
v.	:	
	:	
CONNECTICUT ASSOCIATION OF	:	
OF SCHOOLS, INC., ET AL.	:	
Defendants	:	MARCH 5, 2020

**DEFENDANTS' JOINT MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

The Defendants, **CONNECTICUT ASSOCIATION OF SCHOOLS, INC., BLOOMFIELD BOARD OF EDUCATION, CROMWELL BOARD OF EDUCATION, CANTON BOARD OF EDUCATION, GLASTONBURY BOARD OF EDUCATION** and **DANBURY BOARD OF EDUCATION**, hereby respectfully move for an extension of time up to an including Monday, April 20, 2020, in which to file an answer or otherwise respond to the lawsuit filed by Plaintiffs.

Reasonable cause exists to grant this motion.

First, Defense Counsel for each party requires sufficient time to assess this case, investigate the allegations and develop a litigation strategy. Any argument that Plaintiffs make that Defense Counsel has known about this matter since August, 2019. Is misleading. For example, Attorney Zelman was not retained until days after this lawsuit was filed. Furthermore, several of the Defendants were unrepresented during the OCR proceedings.

Second, during the telephone conference with this Court on February 27, 2020 this Court ordered that the parties meet and confer on March 19, 2020. It is not reasonable that the Defendants would be required to contemplate whether to answer or otherwise respond to the Complaint with a dispositive motion until after that conference. The conference is specifically designed for the

parties to confer on the legal issues involved in this case and develop an appropriate scheduling order. It is very possible that by working together, the parties may be able to obviate the need for any contemplated grounds for a motion to dismiss. This is consistent with this Court's standing order to meet and confer and file a request for prehearing conference prior to filing any dispositive motion. It is also consistent with this Court's admonition to the parties to abide by Rule 1. The requested answer date is just 30 days from the date of this meet and confer conference.

Attorney Zelman, Counsel for Bloomfield and Cromwell, on behalf of all Defendants, has conferred with counsel for the Plaintiffs prior to filing this motion. Plaintiff's Counsel has indicated that he objects to the granting of this motion but would consent to an extension up to an including March 25, 2020, or just four (4) days from the date of the meet and confer conference.

WHEREFORE, for all those reasons set forth above, the Defendants hereby respectfully request that his motion be granted.

DEFENDANTS,  
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CROMWELL BOARD OF EDUCATION

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**CERTIFICATE OF SERVICE**

This is to certify that on this 5<sup>th</sup> day of March, 2020, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

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