

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF THE TRIAL COURT

HAMPDEN, SS.

DISTRICT COURT DEPARTMENT  
PALMER DIVISION  
CIVIL ACTION NO. 1143CV293

|                       |   |                            |
|-----------------------|---|----------------------------|
| <b>Brian Johnson,</b> | ) | <b>MOTION FOR LEAVE</b>    |
| Plaintiff             | ) | <b>TO FILE</b>             |
| <b>v.</b>             | ) | <b>PRETRIAL MEMORANDUM</b> |
| <b>Peter Frei,</b>    | ) | <b>LATE</b>                |
| Defendant             | ) |                            |

Now comes the defendant, Peter Frei, in the above captioned matter and hereby files his Motion For Leave to File his Pretrial Memorandum late.

Frei was supposed to file his Pretrial Memorandum no later than November 9.

Frei also filed his Motion For a Continuance which was allowed by this Court.

Frei works 16 hour days, seven days a week, and just did not have the time to tend to this matter earlier and apologizes.

Frei respectfully asks this honorable Court to allow his Motion.

Respectfully submitted by the Defendant,

Peter Frei  
101 Maybrook Road  
Holland, MA 01521  
phone (413) 245 4660  
November 26<sup>th</sup>, 2018,

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Peter Frei

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the following by First Class Mail, postage prepaid:

Tani E. Sapirstein,  
Sapirstein & Sapirstein, P.C.  
1331 Main Street, 2<sup>nd</sup> Floor  
Springfield, MA 01103

November 26<sup>th</sup>, 2018,

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Peter Frei