

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

TOGETHER EMPLOYEES, by Individual
Representatives, ROBERTA LANCIONE,
JOYCE MILLER, MARIA DIFRONZO,
MICHAEL SACCOCCIO, ELIZABETH
BIGGER, NATASHA DICICCO, NICHOLAS
ARNO and RUBEN ALMEIDA,

Plaintiffs,

v.

MASS GENERAL BRIGHAM
INCORPORATED,

Defendant.

Civil Action No. 1:21-cv-11686

Date Filed: December 7, 2021

**JOINT STIPULATION AND MOTION TO EXTEND DEADLINE FOR DEFENDANT
TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

Plaintiffs, Together Employees, by individual representatives Roberta Lancione, Joyce Miller, Maria DiFronzo, Michael Saccoccio, Elizabeth Bigger, Natasha DiCicco, Nicholas Arno, and Ruben Almeida (collectively, "Plaintiffs") and Defendant Mass General Brigham Incorporated ("MGB") (collectively, the "Parties"), by and through their respective attorneys hereby jointly request that the Court extend the current deadline for Defendant to respond to Plaintiffs' Complaint by two (2) weeks, to December 22, 2021.

In support of this Motion, the Parties hereby jointly stipulate to the following:

1. On October 17, 2021, Plaintiffs filed their Complaint in the District of Massachusetts. Dkt. 1.
2. MGB was served with the Complaint on or about October 18, 2021, making its response to the complaint originally due November 8, 2021. Dkt. 7.

3. On October 25, 2021, the Parties filed a Joint Status Report in which Defendant requested a 30-day extension of time, up to and including December 8, 2021, to respond to Plaintiffs' Complaint, Dkt. 15, and the Court adopted that proposed schedule that same day. Dkt. 17.

4. On December 6, 2021, counsel for the Parties conferred, and Plaintiffs' counsel indicated that they intend voluntarily to dismiss the unincorporated association (Together Employees) and agreed they would amend the Complaint by December 17, 2021.

5. Defendant's counsel proposed that, in light of the forthcoming Amended Complaint, the Parties should stipulate to extend the deadline to respond to that Amended Complaint.

6. The Parties mutually agreed to a two-week extension of the deadline for Defendant to respond to Plaintiffs' Amended Complaint, to December 22, 2021.

WHEREFORE, the Parties respectfully request that the Court grant an extension of time up to and including December 22, 2021 for Defendant to respond to Plaintiffs' Amended Complaint.

DATED: December 7, 2021

Respectfully submitted,

DEFENDANT

MASS GENERAL BRIGHAM
INCORPORATED

By Its Attorneys,

/s/ Lynn A. Kappelman

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PLAINTIFFS

By their attorneys,

/s/ Ryan P. McLane

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CERTIFICATE OF SERVICE

I, Lynn A. Kappelman, certify that on December 7, 2021, I caused a true and accurate copy of the foregoing document to be filed and uploaded to the CM/ECF system.

/s/ Lynn A. Kappelman

Lynn A. Kappelman