UNITED STATES DISTRICT COURT DISTRICT OF MAINE

KATHERINE VEILLEUX, JENNIFER CHON, ROCKY COAST FAMILY ACUPUNCTURE, P.A. and JAMES TILTON, individually and on behalf of all others similarly situated,

Plaintiffs

v.

ELECTRICITY MAINE, LLC, PROVIDER POWER, LLC, SPARK HOLDCO, LLC, KEVIN DEAN and EMILE CLAVET

Defendants

CASE NO: 1:16-cv-571-LEW

PLAINTIFFS' CONSENT MOTION TO EXTEND TIME

NOW COME the Plaintiffs Katherine Veilleux, Jennifer Chon, Rocky Coast Family Acupuncture, P.A., and James Tilton, individually and on behalf of all others similarly situated, and move for an extension of time to file Motion for Preliminary Approval of Proposed Settlement. In support of their Motion, Plaintiffs state the following:

- 1. On October 25, 2019 the parties filed a Status Report regarding the ongoing settlement discussions. On October 28, 2019 the Court set December 27, 2019 as the deadline to file the Motion for Preliminary Approval of Proposed Settlement.
- 2. A number of parties, including insurers, are involved in the resolution of this matter.

 Good faith, yet complicated, negotiations have been ongoing for several months.
- 3. On December 20, 2019 Plaintiffs received written a Proposed Settlement Agreement

from the Defendants. While Plaintiffs are in substantial agreement with the Proposed Agreement, more time is necessary to scrutinize, revise and fine tune adjustments before the final agreement is submitted to the Court for its review.

- 4. Given the holidays, 7 days is insufficient to complete the process, and an enlargement of 30 days is necessary to finalize the Proposed Settlement for submission to the Court.
- 5. The parties jointly request an additional 30 days to file their Motion for Preliminary Approval of Proposed Settlement.

WHEREFORE, the Parties request that this Court extend the deadline for filing the Motion for Preliminary Approval or Settlement Agreement by 30 days to January 26, 2020.

Dated this 23rd day of December 2019, in Portland, Maine.

Respectfully submitted,

/s/ Thomas F. Hallett

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CERTIFICATE OF SERVICE

I, Thomas F. Hallett, Esq., certify that on December 23, 2019, I electronically filed the Plaintiffs' Motion to Extend Time with the Clerk of Court using the CM/ECF system which will send notification of such filings(s) to counsel of record.

Dated this 23rd day of December 2019, in Portland, Maine.

Respectfully submitted,

/s/ Thomas F. Hallett

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Attorney for Plaintiffs and Class Members

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