

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE TRIAL COURT

HAMPDEN, SS.

DISTRICT COURT DEPARTMENT
PALMER DIVISION
CIVIL ACTION NO. 1143CV293

Brian Johnson,)	
Plaintiff)	MOTION FOR LEAVE
v.)	TO REOPEN
Peter Frei,)	DISCOVERY
Defendant)	

Now comes the defendant, Peter Frei, in the above captioned matter and hereby moves this court with his request to reopen discovery.

The reasons defendant's motion needs to be granted are outlined in the attached memorandum in support of defendant's motion.

Respectfully submitted by the Defendant,

Peter Frei
101 Maybrook Road
Holland, MA 01521
phone (413) 245 4660
January 25th, 2019,

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, 2nd Floor
Springfield, MA 01103

January 25th, 2019,

Peter Frei