COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF THE TRIAL COURT

HAMPDEN, SS. DISTRICT COURT DEPARTMENT PALMER DIVISION CIVIL ACTION NO. <u>1143CV293</u>

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

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

The reasons defendant's motion to reconsider 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 April 23, 2019,

Peter Frei

<u>CERTIFICATE OF SERVICE:</u> 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

April 23, 2019,

Peter Frei