

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

In re:	GREATER HARTFORD ARCHITECTURE	:	[Bankruptcy File No. 00-21425]
	CONSERVANCY, INC.	:	
		:	
	Debtor	:	
MARC J. GLASS		:	
	Appellant	:	CIVIL ACTION NO.
		:	3:04cv97(GLG)
		:	
v.		:	
		:	
	GREATER HARTFORD ARCHITECTURE	:	
	CONSERVANCY, INC., <i>et al.</i>	:	MAY 25, 2004
		:	
	Appellees	:	

**MOTION, ON CONSENT, OF APPELLEES NEVETS, INC. AND
STEVEN C. BRIGHAM FOR ENLARGEMENT OF TIME TO FILE BRIEF**

The appellees Nevets, Inc. and Steven C. Brigham (hereinafter "Appellees") hereby move this Court pursuant to L. R. Civ. R. 7(b) for an extension of thirty (30) days, through and including July 7, 2004, to file their responsive brief in this bankruptcy appeal. In support of this motion, Appellees state the following grounds:

1. This bankruptcy appeal was commenced on January 8, 2004 by the filing of a notice of appeal by the appellant Marc J. Glass ("Appellant").¹

¹ Also pending before this Court is Appellees' motion to dismiss the appeal for lack of subject matter jurisdiction. Appellees moved to dismiss because Appellant's notice of appeal related to a final decision of the Bankruptcy Court entered on the docket on December 18, 2003. The notice of appeal was filed well outside the ten (10) day period prescribed in Rule 8002, Fed. R. Bankr. P. Should this Court grant, as Appellees submit it must, the motion to dismiss, the need for Appellees' responsive brief, and a reply brief from Appellant, will be mooted.

2. By notice dated January 29, 2004, the Clerk's office set a briefing schedule in accordance with Rule 8009, Fed. R. Bankr. P.

3. At the request of Appellant, Appellant's time to file his opening brief has been extended on four (4) occasions. Appellant submitted his opening brief on May 18, 2004. Pursuant to Rule 8009, Fed. R. Bankr. P., Appellees' brief would be due on June 7, 2004.²

4. Appellees request an additional thirty (30) days, through and including July 7, 2004, in which to prepare and submit their responsive brief. Appellees' counsel submits that this additional time is necessary to permit proper preparation of a responsive brief and to accommodate the press of Appellees' counsel's business.

5. Appellees' counsel, James C. Graham, telephoned Appellant's counsel, Alan S. Dambrov, on May 25, 2004 to request his consent to this request for additional time. Mr. Dambrov graciously consented to the requested enlargement of time.

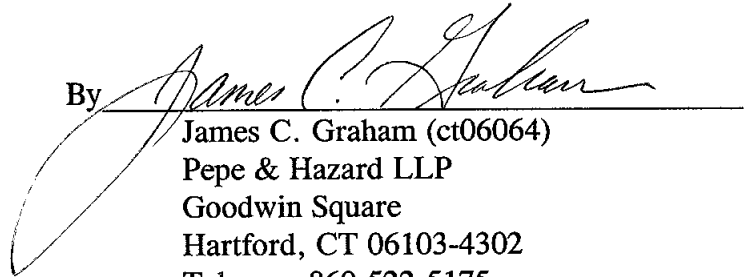
6. This is the first request for an enlargement of time made by the Appellees in connection with this case.

² Rule 8009(a)(2) requires that "the appellee shall serve and file a brief *within fifteen (15) days after service of the brief of the appellant.*" Since the time to file Appellees' brief is expressly measured from *service* of the Appellant's brief, and in this case Appellant served its brief by mail, three (3) additional days are added to the fifteen (15) day period in accordance with Rule 9006(f), Fed. R. Bankr. P. The first business day after the running of the required period is Monday, June 7, 2004.

WHEREFORE, Appellees Nevets, Inc. and Steven C. Brigham request that the time to file their responsive brief be extended for a period of thirty (30) days, through and including July 7, 2004.

NEVETS, INC. and
STEVEN C. BRIGHAM

By



James C. Graham (ct06064)

Pepe & Hazard LLP

Goodwin Square

Hartford, CT 06103-4302

Tel. 860.522.5175

Fax 860.522.2796

Email jgraham@pepehazard.com

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

In re:	GREATER HARTFORD ARCHITECTURE	:	[Bankruptcy File No. 00-21425]
	CONSERVANCY, INC.	:	
	Debtor	:	
MARC J. GLASS		:	
	Appellant	:	CIVIL ACTION NO.
		:	3:04cv97(GLG)
v.		:	
		:	
	GREATER HARTFORD ARCHITECTURE	:	
	CONSERVANCY, INC.	:	
		:	
	Appellee	:	

ORDER

UPON CONSIDERATION OF the Motion, on Consent, of Appellees Nevets, Inc. and Steven C. Brigham for Enlargement of Time to File Brief, the consent of Appellant thereto, and the full record of this case, it appearing to the Court that good cause exists for granting the requested enlargement of time, the motion is hereby GRANTED, and it is

ORDERED AND DECREED, that Appellees Nevets, Inc. and Steven C. Brigham shall file their responsive brief on or before July 7, 2004.

SO ORDERED at Waterbury, Connecticut, this ____ day of _____, 2004.

Gerard L. Goettel
United States District Court Judge

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing motion for enlargement of time was served by U. S. mail, postage prepaid, this 25th day of May 2004 upon each of:

Alan S. Dambrov, Esq.
P.O. Box 575
64 Stevens Park Road
Charlton City, MA 01508-0575
(Counsel for Appellant Marc J. Glass)

Anthony S. Novak, Esq.
Chorches & Novak, P.C.
1260 Silas Deane Highway
Wethersfield, CT 06109
(Counsel for Debtor)

John J. O'Neil, Jr., Esq.
Francis O'Neil DelPiano, LLC
225 Main Street
Hartford, CT 06106
(Chapter 7 Trustee)

Stephen Mackey, Esq.
Office of the U.S. Trustee
One Century Tower, Suite 1103
265 Church Street
New Haven, CT 06510-7016
(Counsel for U.S. Trustee)

Arnold Shimelman, Esq.
Shipman & Goodwin
One American Row
Hartford, CT 06103



James C. Graham