

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT  
DOCKET NO. 1984CV00119-H

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AMANDA DAVIS,	)
	)
Plaintiff,	)
	)
V.	)
	)
ALICE MARK, M.D., PLANNED PARENTHOOD	)
LEAGUE OF MASSACHUSETTS, INC., JOSHUA	)
M. MULARELLA, M.D., CAMBRIDGE PUBLIC	)
HEALTH COMMISSION D/B/A CAMBRIDGE	)
HEALTH ALLIANCE AND CAMBRIDGE	)
HEALTH ALLIANCE PHYSICIANS	)
ORGANIZATION,	)
	)
Defendants.	)

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**JOINT MOTION TO CONTINUE FINAL PRE-TRIAL CONFERENCE**

Plaintiff AMANDA DAVIS (“Plaintiff”) and Defendants ALICE MARK, M.D., PLANNED PARENTHOOD LEAGUE OF MASACHUSETTS, JOSHUA M MULARELLA, M.D., CAMBRDIGE PUBLIC HEALTH COMMISSION d/b/a CAMBRIDGE HEALTH ALLIANCE and CAMBRIDGE HEALTH ALLIANCE (“Defendants”), by and through their counsel, jointly move this Court to continue the Final Pre-Trial Conference presently scheduled for July 26, 2022. This is a medical malpractice action filed by the plaintiff on January 1, 2019, alleging that the defendants, through the actions of their contractors, employees, agents, and/or persons for whom they were legally responsible, were negligent in the treatment and care of the plaintiff, Amanda Davis.

Specifically, the plaintiff alleges that the defendants, through the actions of their contractors, employees, agents, and/or persons for whom they were legally responsible, negligently failed to properly diagnose the plaintiff and failed to prescribe proper and timely treatment for her condition. The plaintiff further alleges that, as a result of the defendants' negligence and the defendants' alleged failure to provide proper oversight, supervision, care and treatment to the plaintiff, Ms. Davis has suffered mental anguish, disability, incurred medical expenses, deprivation of a "more favorable medical outcome," and unnecessary hospitalization.

As grounds for this Motion, the parties state that they have engaged cooperatively in written discovery and conducted several fact witness depositions; however, the parties will require additional time to allow expert witnesses to review the deposition transcripts and finalize their opinions. The parties have conferred and agreed that all counsel are available to appear, finalize a Joint Pre-Trial Memorandum and provide expert disclosures on or before September of 2022. Additionally, counsel for the defendants Cambridge Public Health Commission d/b/a Cambridge Health Alliance and Cambridge Health Alliance Physicians Organization has an unavoidable conflict, a Final Trial Conference scheduled for July 26, 2022, followed by a Trial starting in Suffolk Superior Court (Docket 1884CV00944).

This matter is presently scheduled for a final pre-trial conference on July 26, 2022.

**The parties jointly seek a continuance of the scheduled Final Pre-trial Conference to a date in September of 2022. The parties are in agreement and no party will be prejudiced by the extension of this date. Further, if the Court is amenable to the extension, all parties have conferred and are available on the following dates:**

September 20, 2022  
September 27, 2022  
September 29, 2022

WHEREFORE, the parties respectfully request that this Court grant this joint motion.

**The Plaintiff,**

**AMANDA DAVIS,**

By her attorney,

*/s/ Ross E. Schreiber*

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**The Defendants,**

**ALICE MARK, MD, AND PLANNED  
PARENTHOOD LEAGUE OF  
MASSACHUSETTS, INC.,**

By their attorneys,

*/s/ Eric P. Finamore*

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**The Defendants,**

**CAMBRIDGE PUBLIC HEALTH  
COMMISSION d/b/a CAMBRIDGE  
HEALTH ALLIANCE AND CAMBRIDGE  
HEALTH ALLIANCE PHYSICIANS  
ORGANIZATION,**

By their attorneys,

*/s/ Sean P. Carroll*

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**CERTIFICATE OF SERVICE**

I, Sean P. Carroll, attorney for the above-referenced defendants, hereby certify that on July 12, 2022, I served a copy of the following:

1. Joint Motion to Continue Final Pre-Trial Conference

via First Class Mail and electronic mail, to:

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*/s/ Sean P. Carroll*

Sean P. Carroll