

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

ASSOCIATION TO PRESERVE AND )  
PROTECT LOCAL LIVELIHOODS, *et al.* )

*Plaintiffs,* )

PENOBSCOT BAY AND RIVER PILOTS )  
ASSOCIATION, )

*Plaintiff-Intervenor,* )

v. )

Civil Action No. 1:22-cv-416-LEW

TOWN OF BAR HARBOR, a municipal )  
corporation of the State of Maine, )

*Defendant,* )

CHARLES SIDMAN, )

*Defendant-Intervenor.* )

**CONSENT MOTION TO EXTEND TIME TO FILE PROPOSED STIPULATIONS**

Plaintiffs, Association to Preserve and Protect Local Livelihoods, B.H. Piers, L.L.C., Golden Anchor, L.C., doing business as Harborside Hotel, B.H.W.W., L.L.C., Delray Explorer Hull 495 LLC, Delray Explorer Hull 493 LLC, and Acadia Explorer 492, LLC (collectively “Plaintiffs”), move this Court pursuant to Rule 7(b) of the Federal Rules of Civil Procedure to extend the time for the parties to file Proposed Stipulations under the Expedited Scheduling Order [DktNo. 82], as follows:

1. This Court entered an Expedited Scheduling Order on March 17, 2023 in the above captioned action. *See* [DktNo. 82].
2. The Expedited Scheduling Order requires Proposed Stipulations be filed on or before June 5, 2023.

3. The parties previously requested and were granted the extension of certain deadlines relating to discovery. *See* [Dkt.No.109].

4. In order to allow the parties adequate time to jointly propose stipulations, the parties seek an extension of time in which to file the Proposed Stipulations.

5. The parties have agreed that the Plaintiffs and Plaintiff-Intervenor, jointly, will exchange their proposed stipulations with Defendant and Defendant-Intervenor on June 6, 2023. The Defendant and Defendant-Intervenor will provide responses to the proposed stipulations on June 9, 2023. Thereafter, the parties will file their joint Proposed Stipulations on June 12, 2023.

6. The adjustment of the deadline for the submission of Proposed Stipulations should have no impact on the timing of the trial of this matter.

7. All parties, through counsel, consent to this Motion.

WHEREFORE, Plaintiffs move for an extension of time under the Expedited Scheduling Order as follows:

- a. Deadline for filing Proposed Stipulations to be extended from June 5, 2023 to June 12, 2023, with the Plaintiffs and Plaintiff-Intervenors submitting their proposed stipulations to Defendant and Defendant-Intervenor on June 6, 2023 and Defendant and Defendant-Intervenor responding to the proposed stipulations by June 9, 2023. The parties will file joint Proposed Stipulations on June 12, 2023.

WHEREFORE, Plaintiffs respectfully request that this Court extend the deadline for filing of Proposed Stipulations under the Expedited Scheduling Order as specifically set for herein.

DATED this 2<sup>nd</sup> day of June, 2023.

*/s/ Timothy Woodcock*

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Timothy C. Woodcock, Bar #1663  
P. Andrew Hamilton, Bar # 2933  
Patrick W. Lyons, Bar #5600  
Janna L. Gau, Bar #6043

**EATON PEABODY**

80 Exchange Street (04401)  
Post Office Box 1210  
Bangor, ME 04402-1210  
(207) 947-0111  
twoodcock@eatonpeabody.com  
ahamilton@eatonpeabody.com  
plyons@eatonpeabody.com  
jgau@eatonpeabody.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of June, 2023, I caused the foregoing document to be served upon all counsel of record via email.

*/s/ Timothy Woodcock*

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