

Docketed 7/1/2025

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COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

SUPERIOR COURT

CLAIRE FITZMAURICE, JAY  
TARANTINO, GILANA ROSENTHOL,  
CONEVERY BOLTON VALENCIUS,  
MATTHEW VALENCIUS, LUCILLE  
DIGRAVIO, DAVID REICH, CYNTHIA  
ROCHE-COTTER, MICHAEL COTTER,  
SHERYL LECLAIR, CODY HOOKS,  
SALVATORE BALSAMO, MARIANNE  
BALSAMO, MARTHA PLOTKIN, and  
KATHLEEN GERAGHTY,

*Plaintiffs,*

v.

C.A. No. 2582CV00576

CITY OF QUINCY and THOMAS P.  
KOCH, *in his official capacity as Mayor of  
Quincy,*

*Defendants.*

**JOINT MOTION TO EXTEND RULE 9A DEADLINES CONCERNING  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION  
AND REQUEST FOR HEARING**

The parties jointly move this Court for an extension of deadlines under Massachusetts Superior Court Rule 9A(b)(2), and state as follows:

On June 10, 2025, Plaintiffs served a Motion for Preliminary Injunction upon Defendants. In that motion, as relevant here, Plaintiffs request that this Court preliminarily enjoin Defendants from installing two statues to the new public safety headquarters building currently under construction, located at 1 Sea Street, Quincy, MA 02169.

Defendants have requested the opportunity to respond to Plaintiffs' motion for preliminary injunction by July 9, 2025. Defendants have confirmed that the two statues at issue in this matter

will not be installed or otherwise affixed to the new public safety headquarters before this Court adjudicates Plaintiffs' motion for preliminary injunction.

Accordingly, the parties jointly request leave to file the Rule 9A Package pertaining to Plaintiffs' motion for preliminary injunction no later than July 21, 2025, with Defendants' opposition due to be served upon Plaintiffs no later than July 9, 2025.

The parties further request that the Court set a hearing on the motion for preliminary injunction on or after July 28, 2025, or at the Court's earliest convenience.

Dated: June 27, 2025

/s/ James S. Timmins

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Respectfully submitted,

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*Counsel for Plaintiffs*

\*application for admission *pro hac vice*  
forthcoming

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed through the Electronic Court Filing system on June 27, 2025, and a copy thereof will be sent electronically to the registered recipients as identified on the Notice of Electronic Filing.

/s/ Rachel E. Davidson  
Rachel E. Davidson