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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SEP 13 2 10 PM '84
U.S. DISTRICT COURT
THE DISTRICT OF MASSACHUSETTS

ANNE ANDERSON, et al.,

Plaintiffs,

v.

CRYOVAC, INC., et al.,

Defendants.

CRYOVAC, INC.,

Third-Party Plaintiff,

v.

UNIFIRST CORPORATION,

Third-Party Defendant.

CIVIL ACTION
NO. 82-1672-S

DOCKETED

MOTION OF THIRD-PARTY DEFENDANT
UNIFIRST CORPORATION FOR STAY

Third-party defendant UniFirst Corporation ("UniFirst") hereby moves for a stay of all discovery and proceedings in this action pending a further order of this Court. The grounds for this motion are:

1. Pursuant to an order of this Court entered on September 5, 1984, requiring that all summary judgment motions in this action be filed by December 12, 1984, the defendants and the plaintiffs scheduled fourteen (14) depositions of the

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plaintiffs commencing today.

2. UniFirst was served with a third-party complaint by defendant-third-party plaintiff W.R. Grace & Co. ("Grace") only on Monday, November 5, 1984.

3. On Wednesday, November 7, 1984, UniFirst's attorneys notified the plaintiffs and defendants that, unless the parties or the Court agreed to vacate the order granting Grace leave to file its third-party complaint, UniFirst would be forced to redepose the plaintiffs and seek a modification of this Court's scheduling order.

4. Pursuant to ensuing discussions with the plaintiffs' attorneys, UniFirst has today filed a motion to vacate this Court's order granting Grace leave to implead UniFirst, together with this motion for a stay, and understands that the plaintiffs' attorneys have instructed the plaintiffs not to attend the scheduled depositions pending this Court's disposition of UniFirst's motions.

5. Some period of time will be required to permit the other parties to respond to and the Court to consider UniFirst's motion to vacate. Unless that motion is allowed, additional time will be required for UniFirst to respond to the third-party complaint and to prepare adequately for active participation in the defense of this action, beyond that allowed by the Court's current scheduling order.

In view of the imminence of the deadlines established

by this Court's scheduling order, UniFirst requests a hearing on its motions at the Court's earliest convenience.

UNIFIRST CORPORATION

By its attorneys,



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Dated: November 13, 1984