

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
FT. MYERS DIVISION**

WILLIAM F. TURNER, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

GENERAL ELECTRIC CO.,

Defendant.

CASE NO.: 2:05-cv-186-FtM-33 DNF

**PLAINTIFF'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
CLASS CERTIFICATION MOTION**

Plaintiff, WILLIAM F. TURNER, on behalf of himself and all others similarly situated, by and through undersigned counsel, moves that this Court will grant a 90-day enlargement of time for Plaintiff to file his Class Certification Motion. As grounds, Plaintiff would show that the initial complaint was filed on April 29, 2005, and according to Fed. R. Civ. P. 23(c)(1) and Local Rule 4.04(b), the Class Certification Motion is due on or before July 28, 2005.

The Parties have engaged in extensive, in-person discussions, have shared confidential information, and are working toward clarifying and narrowing the issues in this case.

Defendant has been cooperative in providing informal discovery to Plaintiff, however the data is complex and will reasonably take several months to analyze this data for presentation to this Court

in conjunction with a Motion for Class Certification.

Undersigned has been authorized by opposing counsel to certify that this Motion is unopposed.

**MEMORANDUM OF LAW**

District Courts have broad discretion in managing their cases. *Chrysler Int'l Corp. vs. Chenaly*, 280 F.3d 1358, 1360 (11<sup>th</sup> Cir. 2002). See also, *Johnson v. Bd. of Regents of Univ. Georgia*, 263 F.3d 1234, 1269 (11<sup>th</sup> Cir. 2001).

**CERTIFICATE**

Defendant's counsel has agreed to the entry of an Order granting this Motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Plaintiff's Unopposed Motion for Enlargement of Time to File Class Certification Motion has been electronically filed with the Clerk of Court this 19th day of July, 2005, by using the CM/ECF system which will send notice of electronic filing to: Edward M. Waller, Esquire, Fowler White Boggs Banker, P.A., Post Office Box 1438, Tampa, Florida 33601; James L. Thompson, Esquire, Jenner & Block, LLP, One IBM Plaza, Chicago, IL 60611-7603; Attorneys for General Electric Co., Hal N. Bogard, Esquire, General Counsel, GE Appliances, Appliance Park, Building 2-225, Louisville, KY 40225

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