

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FT. MYERS DIVISION

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

Plaintiff,

v.

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

GENERAL ELECTRIC CO.,

Defendant.

_____ /

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO SECOND AMENDED COMPLAINT**

Defendant General Electric Company (“GE”), with the agreement of counsel for the plaintiff, William F. Turner, hereby moves for entry of an order, in the form attached hereto, enlarging the time in which to serve its response to plaintiff’s Second Amended Complaint. In support of the motion, GE states:

1. On August 11, 2005, the parties filed a Joint Stipulation and Motion for Leave for Plaintiff to File a Second Amended Complaint.

2. The Court granted the Motion by an Order dated August 12, 2005, which stated that GE would have 20 days from the date of filing of the Second Amended Complaint to respond to the Second Amended Complaint.

3. Plaintiff filed his Second Amended Complaint on August 18, 2005.

4. GE’s response to the Second Amended Complaint is currently due on September 7, 2005.

5. As a result of existing calendar conflicts and the nature of the Second Amended Complaint, counsel for GE require additional time to prepare an appropriate response to the Second Amended Complaint.

6. Accordingly, GE requests a further extension of time up to and including October 7, 2005, in which to serve its response to the Second Amended Complaint.

7. Plaintiff's counsel has agreed to this extension, and plaintiff will not be prejudiced by the granting of the enlargement of time.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 3.01(g)

Counsel for the parties have conferred concerning this enlargement. Counsel for the plaintiff has agreed to the requested enlargement.

Respectfully submitted,

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By: /s/ Edward M. Waller, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing to be furnished by electronic filing to the following counsel this 7th day of August, 2005:

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