

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.

_____ /

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO DISCOVERY**

Defendant General Electric Company (“GE”), by and through undersigned counsel, hereby moves the Court for a 30-day extension of time in which to respond to Plaintiff’s First Set of Interrogatories and First Request for Production of Documents, and in support of this motion respectfully shows that:

1. An adequate response to the Interrogatories and Request for Production requires the requested extension of time.
2. The parties have stipulated to the filing of a Third Amended Complaint by the Plaintiff, and appropriate responses to the requested discovery need to await the filing of the Third Amended Complaint.
3. The requested extension will not prejudice the Plaintiff and is not requested merely for the purpose of delay.
4. Federal Rules of Civil Procedure 33 and 34 authorize extensions of time to respond to such discovery.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 3.01(g)

Counsel for the Defendant has attempted to contact counsel for the Plaintiff to obtain agreement to this requested extension but has been unable to reach counsel for the Plaintiff. Undersigned counsel has no reason to believe there would be any objection to an extension of the time in which to respond to the Interrogatories and Request for Production.

Respectfully submitted,

Edward M. Waller, Jr., FBN 106341
Charles Wachter, FBN 509418
Fowler White Boggs Banker P.A.
Post Office Box 1438
(813) 228-7411
(813) 229-8313 (fax)

Attorneys for Defendant
General Electric Company

By: /s/ Edward M. Waller, Jr.
Edward M. Waller, Jr., FBN 106341

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 12th day of October, 2005:

Scott W. Weinstein
Jordan L. Chaikin
Weinstein, Bavly & Moon, P.A.
2400 1st Street, Suite 303
Ft. Myers, FL 33901

Gary E. Mason
The Mason Law Firm, P.C.
1225 19th Street NW, Suite 500
Washington, D.C. 20038

Alexander E. Barnett
The Mason Law Firm, P.C.
P.O. Box 230758
New York, NY 10023

Jonathan W. Cuneo
Charles J. LaDuca
Cuneo Waldman & Gilbert, L.L.P.
317 Massachusetts Avenue NE, Suite 300
Washington, D.C. 20002

William M. Audet
Alexander Hawes & Audet, L.L.P.
300 Montgomery Street, Suite 400
San Francisco, CA 94104

/ s / Edward M. Waller, Jr.
Edward M. Waller, Jr., FBN 106341

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