

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
(MIAMI DIVISION)

CASE NO.: 07-21221-CIV-ALTONAGA/TURNOFF

RENEE BLASZKOWSKI, etc. et al.,

Plaintiffs,

v.

MARS, INC. et al,

Defendants.

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**DEFENDANT WAL-MART STORES INC.'S MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT**  
**(Rule 7.1 Certificate Attached)**

Defendant, Wal-Mart Stores, Inc. ("Wal-Mart"), moves pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local S.D. Rule 7.1 for an enlargement of time to respond to the complaint in this action, and states:

1. Wal-Mart's response to the complaint in this action is due to be served no later than June 4, 2007.
2. Undersigned counsel was just recently retained to represent Wal-Mart in this action.
3. The complaint is a fifty-eight page, ten count complaint. The response to the complaint will take more time than ordinarily permitted under the Federal Rules of Civil Procedure.
4. Accordingly, Wal-Mart requests an enlargement of time to respond to the complaint so that its response will be due no later than July 5, 2007.

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5. The Court has granted enlargements of time to respond to the complaint requested by other parties and Plaintiffs will not be prejudiced if a similar enlargement is provided Wal-Mart.

6. This motion is made in good faith and not for any purpose of undue delay.

WHEREFORE, Wal-Mart requests an enlargement of time so that its response to the complaint in this action is due to be served no later than July 5, 2007.

Dated: June 4, 2007

Respectfully submitted,

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**RULE 7.1 CERTIFICATE**

I HEREBY CERTIFY that on the afternoon of June 4, 2007, I telephoned Plaintiffs' counsel, Catherine MacIvor, Esquire, at approximately 4:05 PM to determine whether Plaintiffs objected to the relief requested in this motion. Ms. MacIvor was unavailable. A detailed message was left on the voice mail of Ms. MacIvor's assistant. I telephoned again at 5:20 PM and was advised that Ms. MacIvor was "not in her office." At the time of filing, I had not received a response from Ms. MacIvor's office.

/s/ John B. T. Murray, Jr.  
John B.T. Murray, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2007, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record identified on the attached Service List.

/s/ John B. T. Murray, Jr.  
John B. T. Murray, Jr.

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**CERTIFICATE OF SERVICE**

**RENEE BLASZKOWSKI, ETC., ET AL., VS. MARS, INC., et al.**  
**Case No. 07-21221-CIV-ATONAGA/TURNOFF**

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