

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MICHAEL McPHERSON, on behalf of
himself and on behalf of a class of
persons and entities similarly situated in
the state of Alabama,

Plaintiff,

v.

GROUPON, INC.,

Defendant.

Case No.: 2:11-cv-342-SRW

MOTION GRANTED

THIS 26 DAY OF May, 20 11
[Signature]
UNITED STATES MAGISTRATE JUDGE

JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT GROUPON, INC.
TO RESPOND TO THE COMPLAINT

Pursuant to Federal Rule of Civil Procedure 7(b), Plaintiff Michael McPherson
("Plaintiff") and Defendant Groupon, Inc. ("Defendant") submit the following Stipulation and
Joint Motion to extend Defendant's time to respond to Plaintiff's Complaint in the above-entitled
matter. In support, the parties state as follows:

- 1. Plaintiff served his Complaint on Defendant on May 10, 2011.
2. Defendant's response to the complaint is due on or before May 31, 2011.
3. On or about March 11, 2011, plaintiffs in two other actions against Groupon1 filed

with the Judicial Panel on Multidistrict Litigation ("JPML") a motion to consolidate this case,
along with multiple other cases pending against Groupon and certain "retailer" defendants in
various district courts and involving similar allegations, in the Northern District of California
("MDL Motion").

1 Ferreira v. Groupon, Inc., No. 11-cv-0132-DMS(POR) (S.D. Cal. filed Jan. 21, 2011) and
Gosling v. Groupon, Inc., No. 11-cv-01038-CRB (N.D. Cal. filed Mar. 4, 2011).