

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DISTRICT**

COTTON BAYOU MARINA, INC., d/b/a
Tacky Jack’s Restaurant; individually and on
behalf of themselves and all others similarly
situated,

Plaintiff,

v.

BP, PLC, et al.,

Defendants.

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CV-10-00243-C

**UNOPPOSED MOTION FOR EXTENSION OF TIME
IN WHICH TO RESPOND TO THE COMPLAINT**

Defendant Cameron International Corporation, appearing specially through undersigned counsel and reserving all objections and defenses, including but not limited to any personal jurisdictional and service of process defenses, moves the Court for an extension of time in which to respond to the Complaint so that the response to the Complaint would be due on July 6, 2010. The grounds of this motion are that this Defendant has been named in over 100 lawsuits in six states involving the oil spill from the well drilled by the BP Deepwater Horizon and needs additional time in which to prepare, coordinate and file appropriate motions, answers or other responses to the numerous complaints. Plaintiffs’ counsel in this action has no objection to the extension, and the Court has given other Defendants this due date. (Doc. 16).

In filing this motion, this Defendant expressly reserves all objections and defenses, including all F.R.C.P. Rule 12(b)(6) defenses, which it might raise in a responsive pleading. Nothing in this motion is intended to be, nor should it be construed as, a waiver of any claim, including any available cross claim, or any defense that this Defendant may possess in this

litigation. *Fisher v. Merryman*, 32 Fed. Appx. 721, 723 (6th Cir. 2002) (finding no waiver of defense because motion for extension is not a responsive pleading). Rather, this Defendant seeks additional time to present any and all claims, cross claims and defenses it possesses.

Respectfully submitted.

/s/ David J. Beck

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(Application for admission pro hac vice to be filed within ten days)

/s/ Robert J. Mullican

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CERTIFICATE OF SERVICE

I hereby certify that I have on May 26, 2010 electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF System which will automatically serve the same via electronic mail or by placing same in the United States mail, properly addressed, first class postage prepaid to the following:

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