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WHEREAS, Defendant The Receivables Management Services Corporation d/b/a RMS ("RMS") requests a 30-day extension of time within which to answer or otherwise respond to the complaint;

WHEREAS, Plaintiff Stephen Wood does not object to RMS' request for a 30-day extension of time within which to answer or otherwise respond to the complaint;

WHEREAS, pursuant to Civil Local Rule 6-1(a), the parties may stipulate in writing, without a Court order, to extend the time within which to answer or otherwise respond to the complaint provided the change will not alter the date of any event or deadline already fixed by Court order;

WHEREAS, this extension of time to answer or otherwise respond to the Complaint will not change or alter the date of any event or deadline already fixed by Court order;

THEREFORE, the parties stipulate and agree that RMS' response to the Complaint shall be due no later than November 9, 2011.

SO STIPULATED.

DATED: October 7, 2011

## REED SMITH LLP

Bv/s/ Abraham J. Colman Abraham J. Colman Attorney for Defendant The Receivable Management Services Corporation d/b/a RMS

DATED: October 7, 2011

## **HYDE & SWIGART**

