

From: Licko, Carol A. [mailto:CALicko@HHLAW.com]
Sent: Friday, November 16, 2007 5:11 PM
To: Catherine J. MacIvor
Subject: Blaszc

Catherine: Counsel for all Defendants have conferred today, and reached a consensus position as to your two proposed motions:

1. As to your request for an extension of 4 months for the Court's Nov. 16 deadline to amend pleadings and join parties, Defendants request you include this response in your motion regarding our good faith conferral:

"Defendants believe the 4-month extension requested by Plaintiffs to amend pleadings and join parties is excessive under the circumstances, but will not formally oppose this request."

2. As to your motion for leave to amend to file the second amended complaint sent to us in draft form (and modified to reflect those defendants you are voluntarily dismissing for lack of personal jurisdiction), Defendants request you include this response in your motion regarding our good faith conferral:

"Defendants will not formally oppose Plaintiffs' motion to amend with the second amended complaint, but will oppose any further amendment. If the Court grants Plaintiffs' motion, Defendants request that the Court also set a briefing schedule allowing Defendants 30 days to serve one consolidated response to the second amended complaint, allowing Plaintiffs 30 days to serve any opposition to Defendants' motion to dismiss, and allowing Defendants 20 days to serve one consolidated any reply."

Thank-you.

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Exhibit "A"