

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO. 07-21221 ALTONAGA/Turnoff

RENEE BLASZKOWSKI, *et al.*,
individually and on behalf of others
similarly situated,

Plaintiffs/Class Representatives,

vs.

MARS INC., *et al.*,

Defendants.

**PLAINTIFFS' MOTION FOR
ENLARGEMENT OF TIME TO SUBMIT
PROPOSED ORDER APPOINTING SPECIAL MASTER**

Plaintiffs, Renee Blaszkowski, *et. al.*, respectfully request this Court to grant an enlargement of time for the Plaintiffs to submit the proposed order appointing a special master, and states as follows:

1. On May 23, 2008, this Court ordered that a Special Magister be appointed in this case.
2. This Court has ordered all parties to submit proposed orders appointing a special master agreed by May 29, 2008.
3. Plaintiffs will be filing a motion regarding the May 23, 2008 Order.
4. The motion cannot be filed without review of the transcript for the May 23rd hearing, which has been requested to be transcribed.
5. The Plaintiffs thus request that the time for submitting any agreement about a special master be temporarily stayed until the transcript can be obtained and the Plaintiffs motion

submitted for the Court's review. The Plaintiffs anticipate that they will file the motion within approximately 48 hours after receiving the transcript.

6. Counsel for the Plaintiffs has conferred with Phil Sechler, who had the opportunity to confer with some of the Defendants. Mr. Sechler has advised that the Defendants take no position as to the enlargement of time.

7. A brief suspension of the requirement to submit the order will not prejudice any party, but it will give the Plaintiffs an opportunity to file their Motion.¹ Moreover, the Plaintiffs do not want to be in a position of having waived any portion of the relief that they will seek by submitting the order.

WHEREFORE, Blaszkowski, *et. al.* request a temporary stay until 48 hours after having received the transcript of the May 23, 2008 hearing so that the Plaintiffs will be able to file and have the Court consider their motion and for all other relief that this Court deems just and proper.

Dated: May 29, 2008
Miami, Florida

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¹ The Plaintiffs have advised that the Defendants do not need to respond to the Requests for Production on May 30, 2008 and the Plaintiffs are in the process of providing more narrow requests to them. There is thus no immediate need for a Special Master.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that the foregoing was electronically filed with the Clerk of the Court via CM/ECF on May 29, 2008. We also certify that the foregoing was served on all counsel or parties of record on the attached Service List either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Filing.

/s Catherine J. MacIvor

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