

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 07-21221-CIV-ALTONAGA/Turnoff

RENEE BLASKOWSKI, AMY HOLLUB and
PATRICIA DAVIS,

Plaintiffs,

vs.

MARS INC.; PROCTOR & GAMBLE CO.,
et al.,

Defendants.

**DEFENDANT COLGATE PALMOLIVE COMPANY'S
AGREED MOTION TO ENLARGE TIME TO PLEAD, MOVE OR OTHERWISE
RESPOND TO COMPLAINT AND TO FILE CERTIFICATE OF INTERESTED
PARTIES AND CORPORATE DISCLOSURE STATEMENT**

Defendant, COLGATE PALMOLIVE COMPANY (hereinafter referred to as "COLGATE"), by and through its undersigned attorneys, pursuant to Local Rule 7.1 of the United States District Court for the Southern District of Florida, moves for an enlargement of time up to and including July 6, 2007 in which to plead, move, or otherwise respond to the Complaint in this action and to file a Certificate of Interested Parties and Corporate Disclosure Statement, and as grounds therefore states:

1. Plaintiffs have filed a class action against Defendant for fraudulent misrepresentation and concealment, negligent misrepresentation, violation of Florida Unfair and Deceptive Trade Practices Act, violation of Florida statute section 817.41, negligence, strict products liability, breach of implied warranty, breach of express warranty and unjust enrichment.

2. On May 15, 2007, Plaintiffs served their Complaint on COLGATE.

3. Due to the press of other matters, COLGATE is unable to properly respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. COLGATE therefore requests that it be given an enlargement of time to plead, move, or otherwise respond to Plaintiffs' Complaint up to and including July 6, 2007.

4. On May 16, 2007, this Court issued an Order Requiring Scheduling Report and Certificates of Interested Parties (DE 7) to be filed on or before June 7, 2007. The Court granted Defendants' Motion for Enlargement of Time to file the joint scheduling report.

5. COLGATE requests that it be given an enlargement of time to file its Certificate of Interested Parties and Corporate Disclosure Statement up to and including July 6, 2007.

6. The undersigned obtained consent for the requested enlargements of time from Plaintiffs' counsel prior to the filing of this motion.

7. This request for additional time is made in good faith and not for purposes of delay. Plaintiff will not be prejudiced if the request is granted as this case is not currently set for trial.

8. A proposed Order granting the requested enlargements of time is attached hereto as Exhibit "A".

WHEREFORE, COLGATE, respectfully requests that this Court grant its Motion to Enlarge Time for Defendant to Plead, Move or Otherwise Respond to Plaintiff's Complaint and to file its Certificate of Interested Parties and Corporate Disclosure Statement up to and including July 6, 2007.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 8, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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