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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION CASE NO.: 07-21221 CIV-CMA

RENEE BLASZKOWSKI, AMY HOLLUB, and PATRICIA DAVIS, individually and on behalf of others similarly situated,

Plaintiffs,
v
MARS, INC., et al,
Defendants.

AGREED MOTION OF DEFENDANT TARGET CORPORATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

The Defendant, Target Corporation, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and with the consent of Plaintiffs, Renee Blaszkowski, Amy Hollub, and Patricia Davis, moves for an extension of time up to and including July 5, 2007, to serve its response to the Complaint. In support of its request, Defendant Target Corporation would show:

- 1. On May 9, 2007, Plaintiffs filed a 58-page Complaint alleging fraudulent misrepresentation and fraudulent concealment, negligent misrepresentation, violations of the Florida Deceptive and Unfair Trade Practices Act, violations of Florida Statute § 817.41, negligence, strict products liability, breach of implied warranty, breach of express warranty, and unjust enrichment against numerous defendants, including Target Corporation.
- 2. On or about May 15, 2007, Plaintiffs served the Complaint on Defendant Target Corporation.

3. The undersigned defense counsel requires additional time to prepare a response to the Complaint or otherwise plead.

- 4. Pursuant to Local Rule 7.1.A.3., counsel for Target Corporation and Plaintiffs have conferred and Plaintiffs have consented to extend the time in this case for Target Corporation to respond to the Complaint or otherwise plead, until July 5, 2007. Similar extensions have been granted to the other Defendants.
- 5. This Motion is made in good faith and not for any purpose of undue delay.

WHEREFORE, Defendant Target Corporation respectfully requests the entry of an Order granting an extension of time up to and including July 5, 2007 to serve its response to the Complaint or to otherwise plead.

Dated this 13th day of June, 2007.

By: /s/ Charles P. Flick

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Attorneys for Defendant,

Target Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of June, 2007, I electronically

filed the foregoing document with the Clerk of the Court using CM/ECF. I also

certify that the foregoing document is being served this day on all counsel of

record or pro se parties identified on the attached Service List in the manner

specified, 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 electronically Notices of Electronic Filing.

By: /s/ Charles P. Flick

Charles P. Flick (FBN: 253324)

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