

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

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 AMENDED 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 20, 2007, to serve its response to the Amended Complaint. In support of its request, Defendant Target Corporation would show:

1. On May 9, 2007, Plaintiffs filed a 58-page Complaint against numerous defendants, including Target Corporation.
2. On or about May 15, 2007, Plaintiffs served the original Complaint on Defendant Target Corporation.
3. By agreement with Plaintiffs' counsel, Defendant Target was to serve its response to the Complaint by July 5, 2007.
4. However, by letter dated June 21, 2007, Plaintiffs' counsel has now advised Defendant Target's counsel of her intention to shortly prepare and file an

Amended Complaint. Plaintiffs' counsel and Target's counsel have now agreed that for reasons of efficiency and economy, rather than serve a response or otherwise plead to the original Complaint, the Defendant Target should now await the filing of the Amended Complaint and then serve its response or otherwise plead thereto by July 20, 2007.

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 20, 2007, to serve its response to the Complaint, or the Amended Complaint, or to otherwise plead.

Dated this 28th day of June, 2007.

By: /s/ Kathleen S. Phang
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Target Corporation*

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 28th 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/ Kathleen S. Phang
Kathleen S. Phang (FBN: 348650)

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U.S. District Court
 Southern District of Florida (Miami)
 Case No: 07- 21221-CIV-CMA

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