

UNITED STATES DISTRICT COURT
Northern District of Indiana
South Bend Division

HEARTLAND RECREATIONAL)	
VEHICLES, LLC,)	
Plaintiff,)	
)	CASE NO. <u>3:08-cv-490</u>
v.)	
)	
FOREST RIVER, INC.,)	JURY DEMAND
Defendant.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO REPLY TO HEARTLAND'S
RESPONSE TO FOREST RIVER'S MOTION TO COMPEL DEPOSITION ON GAIN
FROM USE OF MASTER LIST**

Pursuant for Local Rule 6.1(b), Forest River requests a seven day extension of time in which to file its reply to "Heartland's Response to Forest River's Motion to Compel Deposition on Gain from Use of Master List," that Response being DE#151. The reply was originally due today, January 6, 2011, and with this motion would be due on January 13, 2011. The additional time is needed because the undersigned counsel had a pre-existing commitment to be out of the state and unavailable for substantive briefing in this lawsuit between January 1 and January 10, 2011. Heartland was informed of that pre-existing commitment at least two months previously. Between the evening of December 28 (the service date of the Response) and December 31, the undersigned counsel was unable to complete and file the reply. On January 6, 2011, as part of a conference call regarding various matters, commencing at 2:00 pm, with Heartland's counsel of record, David Imscher and Peter Meyer, the undersigned counsel requested Heartland's consent for this motion, and that consent was given. A proposed form of order is forwarded to chambers concurrently

herewith.

Dated: January 6, 2011

Respectfully submitted,

s/Ryan M. Fountain

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ATTORNEY FOR FOREST RIVER, INC.

Certificate of Service

I certify that on January 6, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF system, which sent notification of such filing to all of the parties through at least the following counsel of record:

David P. Irmischer david.irmscher@bakerd.com

s/Ryan M. Fountain

Ryan M. Fountain
ATTORNEY FOR FOREST RIVER, INC.