

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

WILLIAM D. GREGOIRE; VERONICA G. STELLY; TOBY J. STELLY

versus

TRANSOCEAN, LTD.; TRANSOCEAN OFFSHORE DEEPWATER DRILLING, INC.; TRANSOCEAN DEEPWATER INC.; BP, PLC; BP PRODUCTS NORTH AMERICA, INC.; BP EXPLORATION & PRODUCTION, INC.; HALLIBURTON ENERGY SERVICES, INC.; HALLIBURTON COMPANY; CAMERON INTERNATIONAL CORPORATION; ABC INSURANCE COMPANY; DEF INSURANCE COMPANY; GHI INSURANCE COMPANY; JKL INSURANCE COMPANY; MNO INSURANCE COMPANY; PQR INSURANCE COMPANY; STU INSURANCE COMPANY; XYZ INSURANCE COMPANY

* CIVIL ACTION
* NO. 10-CV-01351
* SECTION "A"
* DIVISION "5"
* JUDGE JAY C. ZAINEY
* MAGISTRATE ALMA CHASEZ
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**EX PARTE MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE RESPONSIVE PLEADINGS**

NOW INTO COURT, through undersigned counsel, come BP Exploration & Production Inc. and BP Products North America, Inc. (collectively the "BP Defendants"), and move this Court for an order granting an extension of time within which to file responsive pleadings in the

above-captioned proceeding, in accordance with Local Rule 7.9E. In support of this motion, BP Defendants represent as follows:

1.

This Court's Local Rule 7.9(E) provides that by *ex parte* motion a party may receive an extension of time to plead of twenty (20) days from the time the pleading otherwise would be due, upon certification that there has been no previous extension of time within which to plead and that the opposing party has not filed into the record an objection to an extension of time.

2.

Responsive pleadings are otherwise due to be filed by BP Defendants on or before June 15, 2010.

3.

Undersigned counsel hereby certifies that there has been no previous extension of time within which to answer, move, or otherwise respond to the complaint in this action, and that the plaintiffs have not filed into the record an objection to an extension of time.

WHEREFORE, BP Exploration & Production Inc. and BP Products North America, Inc. respectfully move this Court on an *ex parte* basis for an extension of time within which to answer, move, or otherwise respond to the complaint in this action of twenty (20) days from the time a responsive pleading otherwise would be due, or through and including July 5, 2010.

Respectfully submitted,

/s/ Don K. Haycraft

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**Attorneys for BP Exploration & Production Inc.
and BP Products North America, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 26, 2010, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the court's electronic filing system. I also certify that I have mailed this filing by United States Postal Service to all counsel of record who are not registered to receive electronic service by operation of the court's electronic filing system.

/s/ Don K. Haycraft

Don K. Haycraft