UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ALAMA ROBINSON, Plaintiff, vs. WESTINGHOUSE AIR BRAKE TECHNOLOGIES CORPORATION, a Delaware corporation; WABTEC CORPORATION, a Pennsylvania corporation; and DOES I-20, inclusive, Defendants.	Civil Action No. 3:09-CV-00202-LRH-RAM *Electronic Filing* **DEFENDANT'S CORRECTED CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT (FIRST REQUEST)** AND ORDER

Defendant Westinghouse Air Brake Technologies Corporation and/or WABTEC Corporation hereby request a 20-day extension to answer or otherwise respond to Plaintiff's Complaint. In support thereof, Defendant states as follows:

1. Plaintiff filed his Complaint in the above-captioned action on April 20,

2009.

2. Plaintiff served his Complaint on Defendant on August 12, 2009. Accordingly, Defendant's answer or other response to the Complaint is due on September 1, 2009.

3. Due to the requirements of other business, Defendant requests a 20 day extension to answer or otherwise respond to Plaintiff's Complaint. Accordingly, Defendant's answer or other response would be due on September 21, 2009.

4. In a telephone voicemail on August 28, 2009, Plaintiff's counsel consented to Defendant's request for a 20-day extension.

5. No prejudice will result to either party by the grant of this Motion.

WHEREFORE, Defendant respectfully requests that its Consent Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint be granted and that Defendant be given until September 21, 2009 to provide an answer or other response to the Complaint.

RESPECTFULLY SUBMITTED this 1st day of SEPTEMBER, 2009

Patrick W. Ritchey, Esq.
Andrew T. Quesnelle, Esq.
REED SMITH LLP
Reed Smith Centre
225 Fifth Avenue
Pittsburgh, PA 15222
Of Counsel, Attorneys for Defendant

Dena Narbaitz, Esq.
CURIALE HIRSCHFELD KRAEMER LLP
5450 Longley Lane
Reno, NV 89511
Attorneys for Defendant

By: _____
Brian Gonsalves, Esq., SBN 9815
GEORGESON ANGARAN, CHTD.
5450 Longley Lane
Reno, NV 89511
Of-Counsel to Curiale Hirschfeld Kraemer LLP
and Attorneys for Defendant

IT IS SO ORDERED this 2nd day of September, 2009.

LARRY R. HICKS
UNITED STATES DISTRICT JUDGE