

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

STANLEY, MANDEL & IOLA, L.L.P.	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:06-cv-01442-L
	§	“ECF”
MILBERG WEISS BERSHAD & SCHULMAN, L.L.P., JOHNSON & PERKINSON, and GIRARD GIBBS, L.L.P.,	§	
	§	
Defendants.	§	

**UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANTS TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants Milberg Weiss Bershad & Schulman, L.L.P., Johnson & Perkinson, and Girard Gibbs, L.L.P. (“Defendants”), through their counsel, make this Unopposed Motion to Extend Time to Answer or Otherwise Respond to Plaintiff’s Complaint, and state as follows:

1. On August 11, 2006, Plaintiff Stanley, Mandel & Iola, L.L.P. (“Plaintiff”) filed its Complaint against Defendants.
2. On or about August 14, 2006 Defendants were served with summons in the above action.
3. Plaintiffs have requested, and Defendants do not oppose that Defendants be granted until October 9, 2006, to file an answer or otherwise respond to Plaintiff’s Complaint.

Based upon the above, Plaintiffs request that this Court extend the time for Defendants to answer or otherwise respond to Plaintiff’s Complaint until October 9, 2006.

Respectfully submitted,

/s/Stephen L. Hubbard

Stephen L. Hubbard

Bar No. 10140500

Robert W. Biederman

Bar No. 02301050

HUBBARD & BIEDERMAN, LLP

1717 Main Street, Suite 4700

Dallas, Texas 75201

Telephone: (214) 857-6000

Facsimile: (214) 857-6001

E-mail: slhubbard@hblawfirm.com

E-mail: rwbiederman@hblawfirm.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

On August 23, 2006, the undersigned, Robert W. Biederman, one of lawyers for Defendants had a telephonic conference with Jeffrey M. Tillotson, one of the lawyers for Plaintiff, who stated that he did not oppose the above Motion.

/s/Robert W. Biederman

Robert W. Biederman

CERTIFICATE OF SERVICE

I hereby certify that on _____ I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the following as service of this document by electronic means:

Jeffrey M. Tillotson, P.C.
LYNN TILLOTSON & PINKER, L.L.P.
750 N. St. Paul Street, Suite 1400
Dallas, Texas 75201
Telephone: (214) 981-3800
Facsimile: (214) 981-3839
E-mail: jmt@lynnllp.com

/s/Stephen L. Hubbard

Stephen L. Hubbard

