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

SUSAN CHANG, AS NEXT FRIEND OF	§	
ALISON CHANG, A MINOR, AND	§	
JUSTIN HO-WEE WONG,	§	
	§	
PLAINTIFFS	§	CA No. 3:07-cv-1767
	§	
VS.	§	
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VIRGIN MOBILE PTY LTD.,	8	
DEFENDANT.	§	
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<u>PLAINTIFFS' UNOPPOSED MOTION TO RESET DEADLINES FOR FED. R. CIV. P.</u> <u>26(F) CONFERENCE AND SUBMISSION OF A SCHEDULING PROPOSAL</u>

Plaintiffs Susan Chang, as next of friend of Alison Chang ("Alison Chang") and Justin Ho-Wee Wong ("Justin Wong") (collectively "Plaintiffs") file this unopposed motion to reset the deadlines for a Fed. R. Civ. P. 26(f) meeting between counsel and the joint submission of a scheduling proposal, and would show the Court as follows:

Currently pending before the Court is Defendant's motion to dismiss filed on December 20, 2007. In response to the motion to dismiss, Plaintiffs' requested the opportunity to conduct jurisdiction discovery¹. On January 3, 2008, the Court entered its order allowing an extension of time for Plaintiffs to file a response to the motion to dismiss by April 9, 2008.

The parties 26(f) conference deadline is currently set for February 8, 2008, with a additional deadline to submit a scheduling proposal by February 15, 2008. Inasmuch as the motion to dismiss may be outcome determinative of the case, Plaintiffs' respectfully request that the 26(f) conference be reset to May 26, 2008, which is thirty two (32) days after Defendant has

¹ Plaintiffs' timely propounded discovery on January 17, 2008.

filed its reply brief on its motion to dismiss. Additionally, Plaintiffs request the parties be permitted to file their scheduling proposal two weeks after the new 26(f) conference deadline which would be June 9, 2008.

Respectfully submitted,

/s/ Ryan H. Zehl

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 1 day of February 2008, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. The system sent a "Notice of Electronic Filing" to the following attorneys of record, all of whom have consented to accept this Notice as service of the document:

Lisa H. Meyerhoff Baker & McKenzie LLP 2001 Ross Ave. Dallas, Texas 75201

> /s/ Ryan H. Zehl Ryan H. Zehl

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), I certify that on February 01, 2008, I had a telephone conversation with Defendant's counsel Myall S. Hawkins who stated that Defendant was unopposed to this Motion.

/s/ Ryan H. Zehl Ryan H. Zehl