

DOCKET NO.: NNH-CV-14-6050848-S

ZHAOYIN WANG,	:	SUPERIOR COURT
Plaintiff,	:	
	:	
v.	:	J.D. OF NEW HAVEN
	:	DOCKET
BETA PHARMA, INC., DON ZHANG AND	:	
ZHEJIANG BETA PHARMA CO., LTD.,	:	
Defendants.	:	SEPTEMBER 10, 2015

CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Practice Book § 10-8, defendants Beta Pharma, Inc. (“Beta Pharma”) and Don Zhang (“Zhang”) (collectively “Defendants”) hereby move upon consent that the Court extend to November 5, 2015 the deadline for a responsive pleading and any other deadline in this action that would otherwise fall on or before November 5, 2015.

On November 10, 2014, plaintiff Zhaoyin Wang filed the present action in this Court, with a return date of November 25, 2014. On December 1, 2014, Defendants removed the action to the United States District Court for the District of Connecticut (the “Federal Court”). Thus, there were twenty-four unexpired days left before the deadline for filing a responsive pleading under Practice Book § 10-8 on the date of removal.

On September 9, 2015, the Federal Court remanded this action to this Court. The deadline for a responsive pleading is tolled during the period while the action is in federal court, and the unexpired days left before the deadline begin to run again on the date of the remand. Traylor v. Parker, 2015 WL 4879984 (Conn. Super. Ct. July 8, 2015). The date of the remand is the date on which the federal court mails the remand to the state court clerk. Tortora v. City of Shelton Bd. of Fire Comm’rs, 2013 WL 4873467 (Conn. Super. Ct. Aug. 23, 2013). Thus, in this case the twenty-four unexpired

Glenn A. Duhl (ct03644)
Siegel, O'Connor, O'Donnell & Beck, P.C.
150 Trumbull Street
Hartford, Connecticut 06103
Telephone: (860) 280-1215
Facsimile: (860) 527-5131
Email: gduhl@siegelconnor.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following counsel of record, who has consented to email service, by email this 10th day of September, 2015.

Jonathan Katz, Esq.
Jacobs & Dow, LLC
350 Orange Street
New Haven, CT 06511
jkatz@jacobsllaw.com; dalbino@jacobsllaw.com

/s/

Michael G. Caldwell