

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

Civil Action No. 3:14-cv-01790-VLB

JANUARY 20, 2015

MOTION FOR EXTENSION OF TIME,
WITH CONSENT OF ADVERSE PARTIES

Plaintiff Zhaoyin Wang hereby moves this court pursuant to Rule 6b of the Federal Rules of Civil Procedure and Rule 7b of the Local Rules of this Court for a seven (7) day extension of time to respond to defendants' Motion to Dismiss [Docket Entry 26]. Plaintiff's response is now due January 28, 2015. Plaintiff requests an extension until February 4, 2015. Counsel for the defense does not object.

Good cause exists for the extension in that defendant's motion raises complex issues of business tort law including the applicability of the "economic loss doctrine" (see, Ulbrich v. Groth, 310 Conn. 375, 78 A. 3d 76 (2013)) to six of the eight counts in plaintiff's complaint. Plaintiff also must do additional research to investigate defendant's claim that plaintiff has failed to plead claims of fraud with sufficient particularity to satisfy the requirements of Federal Rule 9(b). Accordingly, plaintiff seeks additional time to prepare this response.

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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2015, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/

Jonathan Katz, Esq.
Jacobs & Dow, LLC
350 Orange Street
New Haven, Connecticut 06511
Telephone: (203) 772-3100
Facsimile: (203) 772-1691
Federal Juris No.: ct00182
Email jkatz@jacobsllaw.com