

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

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

No. 3:14CV1790 (VLB)

MAY 7, 2015

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO REQUEST FOR PRODUCTION OF
DEPOSITION TRANSCRIPTS AND EXHIBITS AND SWORN STATEMENTS**

Pursuant to Rule 7(b) of the Local Rules of this Court, defendants Beta Pharma, Inc. and Don Zhang (collectively "Defendants") hereby move for an extension of time of thirty (30) days to answer or object to Plaintiff's Request for Production of Deposition Transcripts and Exhibits and Sworn Statements (the "Request for Production re Transcripts"). Defendants' response to that Request is currently due on May 11, 2015, and thus the requested extension would extend the deadline to June 10, 2015.

Good cause exists for extension of this time limitation because the Request for Production re Transcripts seeks a variety of documents from an action pending in the Superior Court of New Jersey, requiring Defendants to spend substantial time to review documents and determine the appropriate response to that Request.

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Defendants' counsel has inquired of Plaintiff's counsel, and has determined that Plaintiff consents to this extension of time. This is the first extension of time that Defendants have requested with respect to this time limitation.

WHEREFORE, Defendants respectfully request that the deadline for their response to the Request for Production re Transcripts be extended by thirty (30) days, to June 10, 2015.

**DEFENDANTS BETA PHARMA, INC. AND
DON ZHANG,**

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 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/

Michael G. Caldwell (ct 26561)