

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 PLAINTIFF'S FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS**

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 First Interrogatories and Requests for Production of Documents to All Defendants (the "Discovery Requests"). Defendants' response to the Discovery Requests is currently due on May 13, 2015, and thus the requested extension would extend the deadline to June 12, 2015.

Good cause exists for extension of this time limitation because the Discovery Requests are very extensive, including twenty-four interrogatories and forty requests for production covering a variety of topics. Thus, Defendants must obtain and review a large amount of information and a large number of documents in order to respond appropriately.

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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 Discovery Requests be extended by thirty (30) days, to June 12, 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)