

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

MAY 30, 2015

CONSENT MOTION TO EXTEND TIME TO RESPOND TO DEFENDANTS' DISCOVERY
REQUESTS

Pursuant to Local Rule 7(b), plaintiff moves this court for an extension of time of 30 days to answer or object to defendants' first interrogatories and requests for production. Plaintiffs' responses are currently due May 30, 2015 and the requested extension would enlarge the deadline till June 30, 2015. This is the first extension requested with respect to this deadline.

Plaintiff's counsel has conferred with counsel for the defense, and defense counsel consents to this extension of time.

Good cause exists for the extension, in that the discovery requests are comprehensive, and in that plaintiff is a citizen of Quebec, frequently abroad in China, and compliance requires plaintiff to access his information remotely to assemble responses.

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