

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

JUNE 29, 2015

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

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

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 29, 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/

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