

3. Because of the substantial number of new or modified allegations in the counterclaim, however, Plaintiff requests additional time to prepare and submit a motion addressed to the counterclaim. Plaintiff therefore requests that this Court grant it an additional fourteen (14) days, until October 14, 2013, to answer or otherwise plead to the amended counterclaim.
4. Plaintiff does not bring this Motion for purposes of causing undue delay or for any improper purpose. Plaintiff does not believe that its request for an extension of time will have an impact on the scheduled status date of December 12, 2013 (ECF No. 35.)

WHEREFORE, for all of the foregoing reasons, Plaintiff respectfully requests that this Court grant this Motion; grant it until October 14, 2013 to answer or otherwise plead to the amended counterclaim; and grant any and all further relief that this Court deems to be reasonable and appropriate under the circumstances.

Respectfully submitted,

Paul A. Duffy, PLAINTIFF

DATED: September 30, 2013

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 30, 2013, all counsel of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document using the Court's CM/ECF system, in compliance with Local Rule 5.2(a).

/s/ Paul Duffy
Paul Duffy

