

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

HOLIDAY SHORES SANITARY DISTRICT, *
Individually and on behalf of all others similarly *
Situated * NO. 04-688-MJR

VS. *

SYNGENTA CROP PROTECTION, INC.; and *
GROWMARK, INC. *

* * * * *

JOINT MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S ORIGINAL CLASS ACTION COMPLAINT
AND FIRST AMENDED CLASS ACTION COMPLAINT

COME NOW Plaintiff and defendant Syngenta Crop Protection, Inc., by and through their attorneys, and respectfully move that this Court enter its Order that defendant's responsive pleadings in regard to plaintiff's original Class Action Complaint and First Amended Class Action Complaint would be due thirty (30) days after this Court issues its ruling on plaintiff's motion to remand. In support, the parties state that this Court has currently set a deadline of November 1, 2004 for defendant's responsive pleadings. The parties have conferred and mutually agree that neither would be prejudiced by an extension of the deadline to file such responsive pleadings. A proposed Order has been e-mailed separately to the Court. Defendant Syngenta is filing this motion on behalf of itself and the plaintiff.

WHEREFORE, Plaintiff and defendant Syngenta Crop Protection, Inc. jointly move that this Court enter its Order that defendant's responsive pleadings to plaintiff's

original Class Action Complaint and First Amended Class Action Complaint would be due thirty (30) days after this Court has issued its ruling upon plaintiff's motion to remand in the instant case.

Respectfully submitted,

REEG, NOWOGROCKI & YECKEL, L.L.C.

/s/Kurtis B. Reeg
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CERTIFICATE OF SERVICE

I do hereby certify that I have on this on this 28th day of October, 2004, the foregoing pleading was filed electronically with the Clerk of Court and notice has been given to all counsel for all parties to this proceeding.

/s/Kurtis B. Reeg
KURTIS B. REEG

