

Defendant agrees that should it choose to file a dispositive motion in response to the amended complaint, it will not object to the filing of a second amended complaint aimed at curing pleading defects identified in the motion, except on the ground of futility.

This is the second motion to extend the time to respond to the complaint. However, it is the first time the parties have addressed the timing of response to the proposed amended complaint. The parties respectfully submit that there is good cause for the granting of this request.

WHEREFORE, the Parties respectfully request that the Court order the filing of an amended complaint by October 18, 2019 and reset Defendant's response date to November 15, 2019.

Respectfully submitted,

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