IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CRAIG LENELL, THOMAS URBANEK,

JARED PELA, TIMOTHY CHRISTIAN,

JOHN LEWIS, CARLOS PEREZ, and

PHILLIP WILTSHIRE on behalf of

themselves and all others similarly situated,

CLASS ACTION

No. 2:14-cv-01924-LDD

Plaintiffs,

:

VS.

ADVANCED MINING TECHNOLOGY,

INC. (a/k/a ADVANCED MINING TECHNOLOGIES, INC.); JOSHUA

ZIPKIN; and JIM BROWN,

JURY TRIAL DEMANDED

Defendants.

PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

Plaintiffs respectfully request that the Court enter the proposed order submitted herewith extending the deadline for them to file a response to Defendants' motion to dismiss, which was filed on July 17, 2014. *See* Docket Entry No. 19. Pursuant to Local Rule 7.1(c), Plaintiffs' response to that motion is currently due on July 31, 2014. Plaintiffs respectfully request that this deadline be extended by 14 days (*i.e.*, until August 14, 2014).

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Plaintiffs' counsel has conferred with counsel for Defendants, who have advised that they do not oppose this request.

Dated: July 24, 2014 Respectfully submitted,

By: /s/ Kimberly Donaldson Smith

Kimberly Donaldson Smith

Benjamin F. Johns

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Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I, Kimberly Donaldson Smith, certify that on this 24th day of July 2014, I caused the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS THE FIRST AMENDED COMPLAINT,** and accompanying proposed order, to be filed using the Court's CM/ECF record, thereby serving these materials upon all counsel of record in this case.

By: <u>/s/ Kimberly Donaldson Smith</u> Kimberly Donaldson Smith