

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FISHER-PRICE, INC. and  
MATTEL, INC.,

Plaintiffs,

v.

DYNACRAFT BSC, INC.,

Defendant.

C.A. No. 17-0051-LPS-CJB

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND TIME**

WHEREAS, plaintiffs Fisher-Price, Inc. and Mattel, Inc. (“Plaintiffs”) filed the Complaint in the above-captioned action (the “Complaint”) on January 17, 2017 (D.I. 1);

WHEREAS, on April 14, 2016, Plaintiffs served the Complaint and summons on defendant Dynacraft BSC, Inc. (“Defendant”), c/o Larry L. Saret, Esquire, MICHAEL BEST & FRIEDRICH LLP, 444 West Lake Street, Suite 3200, Chicago, IL 60606, pursuant to Mr. Saret’s agreement to accept service of process on behalf of Dynacraft BSC, Inc.;

WHEREAS, Defendant’s response to the Complaint is due to be filed on May 5, 2017;

WHEREAS, Defendant has not yet retained Delaware counsel to appear in the above-captioned action;

WHEREFORE, Plaintiff respectfully requests that the Court extend the deadline for Defendant to answer, move, or otherwise respond to the Complaint to and including June 5, 2016.

Dated: April 26, 2017

**YOUNG CONAWAY STARGATT & TAYLOR LLP**

*/s/ Karen L. Pascale*

---

Karen L. Pascale (#2903) [[kpascale@ycst.com](mailto:kpascale@ycst.com)]

Pilar G. Kraman (#5199) [[pkraman@ycst.com](mailto:pkraman@ycst.com)]

Rodney Square

1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

[kpascale@ycst.com](mailto:kpascale@ycst.com)

[pkraman@ycst.com](mailto:pkraman@ycst.com)

OF COUNSEL:

John R. Hutchins

**ANDREWS KURTH KENYON LLP**

1350 I Street NW, Suite 1100

Washington, D.C. 20005

Telephone (202) 662-2700

Facsimile (202) 662-2739

[johnhutchins@andrewskurthkenyon.com](mailto:johnhutchins@andrewskurthkenyon.com)

*Attorneys for Plaintiffs*

*Fisher-Price, Inc. and Mattel, Inc.*

**CERTIFICATE OF SERVICE**

I, Karen L. Pascale, Esquire, hereby certify that on April 26, 2017, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, and in addition caused true and correct copies of the foregoing document to be served upon the following counsel by electronic mail:

Larry L. Saret  
Arthur Gollwitzer III  
MICHAEL BEST & FRIEDRICH LLP  
River Point  
444 West Lake Street  
Suite 3200  
Chicago, Illinois 60606  
LLSaret@michaelbest.com

*LLSaret@michaelbest.com*  
*AGollwitzer@michaelbest.com*

April 26, 2017

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

*/s/ Karen L. Pascale*

---

Karen L. Pascale (No. 2903) [*kpascale@ycst.com*]  
Pilar G. Kraman (#5199) [*pkraman@ycst.com*]  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: 302-571-6600  
*Attorneys for Plaintiffs,*  
*Fisher-Price, Inc. and Mattel, Inc.*