

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

BAXTER HEALTHCARE CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-303-RGA
)	
HOSPIRA, INC. and ORION CORP.,)	
)	
Defendants.)	

**HOSPIRA, INC.’S MOTION FOR A FOURTEEN (14) DAY EXTENSION
OF TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1), Defendant Hospira, Inc. (“Hospira”) respectfully moves for a fourteen (14) day extension of time to answer, move or otherwise respond to the Complaint (D.I. 1) (the “Motion”). Pursuant to District of Delaware Local Rule 7.1.1, counsel for Hospira has conferred with counsel for Plaintiff Baxter Healthcare Corporation (“Baxter”). Baxter **opposes** the Motion.

Hospira respectfully represents as follows in support of the Motion:

1. On February 22, 2018, Baxter filed the Complaint (D.I. 1) in this action.
2. Hospira was served with the Complaint on February 23, 2018 (D.I. 5). Hospira’s response to the Complaint is due on March 16, 2018.
3. Hospira seeks a modest extension of time to respond to the Complaint in order to investigate the allegations of the Complaint, to consider how it will respond to the Complaint and to consult with its attorneys regarding a proposed course of action. This is the first extension of time to respond to the Complaint requested by Hospira.

4. This Court has discretion to grant a motion to extend the time to file a responsive pleading for good cause. Fed. R. Civ. P. 6(b)(1). Hospira respectfully submits that for the reasons set for the above, it has established good cause for a short, fourteen (14) day extension of time to respond to the Complaint.

5. As a result of this Court's holiday on March 30, 2018, Hospira's response to the Complaint would be due on **April 2, 2018** if the Motion is granted.

WHEREFORE, Hospira respectfully requests the entry of an order extending the time by fourteen (14) days for it to answer, move or otherwise respond to the Complaint permitting it to respond to the file the Reply Brief within one day of such order.

Dated: March 16, 2018

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SO ORDERED this _____ day of _____, 2018.

United States District Judge