



WHEREFORE, Groupon respectfully requests that the Court grant this motion and allow it up to and including February 25, 2013, in which to file a combined response to Plaintiff's Motion to Dismiss Under Fed. R. Civ. P. 12(b)(6) and Motion to Strike Under Fed. R. Civ. P. 12(f).

Respectfully submitted,

/s/ Annie T. Christoff

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**CERTIFICATE OF CONSULTATION**

Prior to the filing of this motion, counsel for Plaintiff, Richard Carter, was consulted and indicated that Plaintiff does not object to the relief requested herein.

/s/ Annie T. Christoff

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 8th day of February, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Annie T. Christoff

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