

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 19-22128-CIV-SMITH/Louis**

**WOOD MOUNTAIN FISH, LLC,**

**Plaintiff,**

v.

**MOWI ASA, et al.,**

**Defendants.**

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**AGREED MOTION FOR ENLARGEMENT OF TIME  
FOR DEFENDANTS TO RESPOND  
TO CLASS ACTION COMPLAINT**

Defendants Ocean Quality USA, Inc., Ocean Quality Premium Brands, Inc., Marine Harvest USA, LLC, Ducktrap River of Maine, LLC and Leroy Seafood USA Inc. (Movants), pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, hereby move the Court for an Order extending the deadline by which the Movants must respond to the Plaintiffs' Class Action Complaint to and including August 2, 2019. Plaintiff agrees to, and does not oppose, the relief requested herein. In support thereof, Movants state as follows:

1. On May 24, 2019, Plaintiff Wood Mountain Fish LLC ("Plaintiff") filed a Class Action Complaint [ECF No. 1] on behalf of Indirect Purchaser Plaintiffs (the "Action").
2. On June 17, 2019, Plaintiff served the Complaint in this action on Ocean Quality USA Inc. [ECF No. 28] On June 19, 2019, Plaintiff served the Complaint on Leroy Seafood USA Inc. [ECF No. 29] And on June 25, 2019, Plaintiff served the Complaint on Ocean Quality Premium Brands, Inc. [ECF No. 25]

3. On June 20, 2019, the Court issued an Order appointing Wolf Haldenstein Adler Freeman & Herz LLP as Interim Class Counsel for the Indirect Purchaser Plaintiffs.

4. Plaintiffs stated in their status report on June 26, 2019 that “Plaintiff’s counsel have spoken with one of the lead counsel for the plaintiffs in the Direct Action [pending before Judge Altonaga], and based on such conversation, Plaintiff anticipates no difficulties in coordinating pretrial proceedings for the Action with the Direct Action.” [ECF No. 27 at 2]

5. Granting this motion to extend time will conserve the resources of all Parties and the Court in several important ways including providing time for his Court to consider whether it will hold an initial scheduling conference and allowing other defendants to make their appearances before this Court.

6. This Motion is not filed for the purpose of delay.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), on July 2, 2019, Movant’s counsel conferred with Interim Class Counsel for the Indirect Purchaser Class, Fred Isquith, prior to the filing this Motion. Mr. Isquith advised that the Plaintiff agrees to an extension of time for the Defendants to file responsive pleadings to the Complaint not later than August 2, 2019.

WHEREFORE, the Movants respectfully request this Court to enter an Order extending the date by which the Movants must respond to the Operative Class Action Complaint to and including August 2, 2019.

Dated: July 3, 2019

Respectfully submitted,

By: /s/ Christine Welstead  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2019, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court by using CM/ECF, which will send electronic notice of such filing to all counsel of record.

/s/ Christine Welstead

Christine L. Welstead