IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VIRBAC CORPORATION	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:05CV01128
	)	Judge: Ricardo M. Urbina
CHANELLE PHARMACEUTICALS MANUFACTURING LTD., *et al.*,	)	
	)	
Defendants.	)	

VIRBAC CORPORATION'S CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff, Virbac Corporation ("Virbac"), through counsel and pursuant to LCvR 7, hereby moves this Court for an Order granting Virbac an extension of time, through and until October 18, 2005, within which to file its Memorandum of Points and Authorities in Opposition to the Motion to Dismiss filed by Defendants Hartz Mountain Corporation ("Hartz"), Albert Ahn and Ian Cottrell (collectively, the "Hartz Defendants"). As grounds therefore, Virbac states as follows:

1. Virbac filed its Complaint herein on June 7, 2005.

2. Although Virbac has not yet served the Hartz Defendants with the Summons and complaint in this action, on September 30, 2005,[1] the Hartz Defendants elected to file their Motion to Dismiss or Transfer for Improper Venue, along with supporting Memorandum, Certifications and numerous exhibits.

3. The time for Virbac to file its Memorandum of Points and Authorities in Opposition to the Motion has not yet expired.

[1] On October 4, 2005, the Hartz Defendants filed and served several Notices with various attachments in an apparent effort to file, or re-file, certain additional exhibits to the Motion.

4. Virbac requires this relatively modest extension of time to review the Hartz Defendants' Motion and voluminous attachments and to prepare a full and complete response.

5. Pursuant to LCvR 7(m), counsel for Virbac has conferred with counsel for the Hartz Defendants and counsel for Chanelle and Mr. Burke in a good faith effort to determine whether there is any opposition to this request. All Defendants have consented to this Motion.

WHEREFORE, Virbac respectfully requests that this Court enter an Order granting Virbac an extension of time, through and until October 18, 2005, within which to file its Memorandum of Points and Authorities in Opposition to the Hartz Defendants' Motion to Dismiss.

Respectfully submitted,

/s/ Richard D. Horn

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October, 2005, I caused a true and correct copy of the foregoing to be served by electronic mail on the following persons:

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