IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THE DOW CHEMICAL COMPANY, Plaintiff, v. NOVA CHEMICALS CORPORATION (CANADA), AND NOVA CHEMICALS INC. (DELAWARE), Defendants.	)	C.A. No. 05-737-JJF

PLAINTIFF'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO EFFECT SERVICE

Pursuant to Federal Rules of Civil Procedure 4(m) and 6(b), plaintiff, The Dow Chemical Company, moves for an order, in the form attached hereto, extending the period for service of the summons and complaint upon defendants in this action through and including June 21, 2006. The grounds for this motion are:

1. This action was filed on October 21, 2005. Rule 4(m) permits 120 days to serve the summons and the complaint. That time has been extended previously by agreement of the parties and approval of the Court (D.I. 4 & 5).

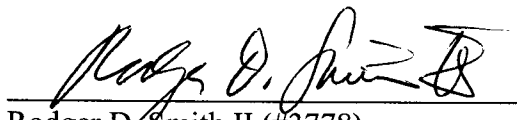
2. In order to facilitate settlement discussions, plaintiff has not served the complaint upon defendants. Since the filing of the complaint, the parties have been actively discussing settlement of this case.

3. Plaintiff believes that an additional sixty (60) days to serve the summons and complaint, thereby extending the period for service through and including June 21, 2006, will allow the parties to further pursue settlement discussions without requiring them to incur the

costs and expense of litigation. Defendants have advised plaintiff that they do not oppose the extension sought.

4. Rules 4(m) and 6(b) provide that the Court, in its discretion, may enlarge the time for cause shown.

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April 7, 2006
504584

RULE 7.1.1 CERTIFICATION

Plaintiff has discussed the subject of the foregoing motion with defendants, and defendants do not oppose the relief requested.

Rodger D. Smith II

April 7, 2006

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ORDER

The Court, having considered Plaintiff's Unopposed Motion for Enlargement of Time to Effect Service;

IT IS HEREBY ORDERED that the time in which plaintiff The Dow Chemical Company may effect service of process of the summons and complaint is extended until June 21, 2006.

Dated this ____ day of _____, 2006.

_____
United States District Judge