IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ARGENTUM MEDICAL, LLC.,	)	
	)	
Plaintiff,	)	No. 07 CV 6769
	)	
v.	)	Hon. George W. Lindberg
	)	
	)	Magistrate Judge Jeffrey Cole
NOBLE BIOMATERIALS, and	)	
DERMA SCIENCES, INC.,	)	
	)	
Defendants.	)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE ITS AMENDED COMPLAINT

NOW COMES plaintiff, Argentum Medical LLC. ("Argentum"), by and through its attorneys of record, and respectfully moves this Honorable Court for entry of an order granting Argentum leave to file its Amended Complaint in the above-identified action. This is the first motion by Argentum seeking to amend the Complaint and is filed while limited discovery is proceeding on jurisdictional issues. Substantive discovery has been stayed.

The ground for this motion is that, recent events have come to light that Argentum believes support additional counts relating to violations of Section 43 (a) of the Lanham Act (Title 15, United States Code, §1125 (a)), violations of

the Illinois Deceptive Trade Practices Act (815 ILCS 510/2 (2008)), and tortious interference with prospective economic advantage against defendant Derma Sciences, Inc. ("Derma").

The facts on which this motion is based are set forth in the accompanying memorandum, along with supporting authority showing that it is appropriate to grant leave to file an Amended Complaint here. Indeed, since this suit is in its early stages - - before any answers have been filed. Thus, defendants would not suffer prejudice if the Amended Complaint were to be entered. A copy of the Amended Complaint is attached as Exhibit 1 hereto.

WHEREFORE, Argentum respectfully requests entry of an order in accordance with the prayer of this motion.

Respectfully submitted,

/s/ Joseph A. Fuchs
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 18, 2008, a true and correct copy of the following document:

PLAINTIFF'S MOTION FOR LEAVE TO FILE ITS AMENDED COMPLAINT

was filed electronically with the Clerk of Court using the CM/ECF System, which will provide electronic notice to the following attorneys for Defendants:

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/s/ Joseph A. Fuchs
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