
STATE OF WISCONSIN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04-CV-1709
)	Unclassified – Civil: 30703
AMGEN INC., et al.,)	
)	
Defendants.)	
)	

**WISCONSIN’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE AMENDED COMPLAINT**

Wisconsin moves the Court for an order granting them an additional 25 days, to and including June 30, in which to file its amended complaint for the reasons that follow:

1. In its first stage ruling on defendants’ motion to dismiss the Court required plaintiff to replead “with as much detail as Plaintiff can provide”, the drugs involved, and the false prices published for them. Decision at 13.
2. The Court directed that this repleading be submitted by June 5, 2006: “Subject to the right to obtain an extension.” Decision at 14.
3. Since the issuance of the Court’s opinion plaintiff has been working to compile and chronicle the information necessary to meet the Court’s repleading expectations. This effort requires an enormous marshalling of information, involving millions of transactions from sources other than the defendants.
4. Because of the scope of this undertaking plaintiff needs the additional 25 days beyond the June 5, date to complete the task the Court has set out for it.

5. Defendants' have informed plaintiff that they have no objection to this motion.

Dated this 17th day of May, 2006.

Respectfully submitted,



One of Plaintiff's Attorneys

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