

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL M. CULLINAN, as Executor of
the Estate of Paul R. Cullinan,
deceased, and in his own behalf;
Edward Cullinan; Patricia Layton;
and Margaret Cullinan,

Plaintiffs,

v.

MONSANTO COMPANY; THE DOW
CHEMICAL CO.; B.F. GOODRICH CO.;
GREAT AMERICAN CHEMICAL CORP.,

Defendants.

CIVIL ACTION
NO.

PLAINTIFFS' MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S REMOVAL

Plaintiffs in the above-entitled action hereby move for an extension of time to respond to Dow Chemical Company's removal of this action to the Federal Court. There may be a basis for opposing defendant's removal and seeking remand of this case to state court in that defendant Great American Chemical Corp. had its principal place of business in Massachusetts at the time of its tortious conduct. Plaintiffs request an extension of time until October 15, 1985 to respond to defendant's removal and to determine whether to oppose such removal and seek remand. Plaintiffs seek this extension for the following reasons:

GACC 00486

1. Plaintiff's counsel, Keith S. Halpern will be on a long-planned vacation from September 14, 1975 through October 7, 1985. Defendant removed this action September 12, 1985.

2. Plaintiff's counsel Nancy Gertner is presently working as a visiting Professor at the Harvard Law School and is carrying a full teaching load.

By their attorneys,

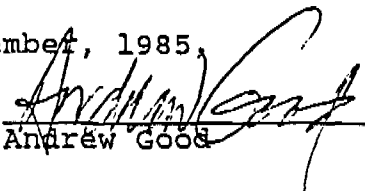

Nancy Gertner


Keith S. Halpern
SILVERGLATE, GERTNER, BAKER
& FINE
88 Broad Street
Boston, MA 02110
(617) 542-6663

CERTIFICATE OF SERVICE

I, Andrew Good, hereby certify that I served the foregoing instrument by mailing copies of same, via first class, postage prepaid mail, on this day to Lane McGovern and Paul V. Kelly, Ropes & Gray, 225 Franklin Street, Boston, MA 02110; Thomas W. Porter, Jr. and Robert P. Powers, Melick & Porter, 11 Arlington St., Boston, MA 02116 and Allan VanGestel and Timothy J. Langelia, Goodwin, Proctor & Hoar, 28 State Street, Boston, MA 02109. A copy was also served upon the Secretary of the Commonwealth for service upon Great American Chemical Corp.

Done this 17th day of September, 1985.


Andrew Good