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*Attorneys for Defendants Sanofi-Aventis US,  
 Chattem, Inc., and Quten Research Institute, LLC*

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON  
 PORTLAND DIVISION

JORDEN HOLLINGSWORTH,

Plaintiff,

v.

SANOFI-AVENTIS US LLC; CHATTEM INC.; QUTEN RESEARCH INSTITUTE LLC; AMJ SERVICES LLC; STEVEN S. DICKERT, in his capacity as Trustee of BASIL MANAGEMENT TRUST,

Defendants.

Case No.: 3:25-cv-2308-SB

**DEFENDANTS SANOFI-AVENTIS US,  
 CHATTEM, INC., AND QUTEN  
 RESEARCH INSTITUTE, LLC'S  
 UNOPPOSED MOTION FOR  
 EXTENSION OF TIME TO RESPOND  
 TO COMPLAINT**

**LR 7-1 CERTIFICATION**

The undersigned certifies that Counsel for Defendants Sanofi-Aventis US (“Sanofi”), Chattem, Inc. (“Chattem”), and Quten Research Institute, LLC (“Quten”) (Sanofi, Chattem, and Quten, collectively, “Defendants”) conferred with Plaintiff by email on January 21, 2026, regarding this Unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint (the “Motion”). *See* Declaration of Helen E. Tuttle in Support of Defendants’ Motion (“Tuttle Decl.”), ¶ 3, Ex. 1.

**MOTION**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants move for an extension of time, through and including February 11, 2026, for Defendants to answer, move, or otherwise plead or defend as to the Complaint.<sup>1</sup>

**MEMORANDUM****I. PROCEDURAL HISTORY**

Plaintiff commenced this action by filing his Complaint on December 11, 2025. The affidavit of service filed by Plaintiff (Dkt. No. 4) states that he served Sanofi on December 31, 2025, and that he served Chattem and Quten on January 5, 2026.<sup>2</sup>

**II. ARGUMENT**

Fed. R. Civ. P. 6(b)(1)(A) permits a court to extend a defendant’s time to respond to a complaint for “good cause.” “Good cause” is a non-rigorous standard that has been construed broadly across procedural and statutory contexts.” *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010). Rule 6(b)(1) is “to be liberally construed to effectuate the general

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<sup>1</sup> By filing the Motion, Defendants do not waive their right to assert any affirmative defenses to the allegations contained in the Complaint.

<sup>2</sup> Defendants do not concede that they were served properly and expressly reserve all rights, including their rights to challenge the sufficiency of service of process.

purpose of seeing that cases are tried on the merits.” *Id.* “Consequently, requests for extensions of time made before the applicable deadline has passed should ‘normally … be granted in the absence of bad faith on the part of the party seeking relief or prejudice to the adverse party.’” *Id.* (ellipsis in original).

This is Defendants’ first request for an extension of time to answer, move, or otherwise plead or defend as to the Complaint. Defendants seek this extension to obtain additional time to review and analyze the allegations in the Complaint, review relevant documents, and prepare an appropriate response. The Motion is not made for any improper purposes or to cause undue delay, and no prejudice would result from granting the Motion.

### III. CONCLUSION

For the reasons set forth above, Defendants respectfully request that the Court issue an order extending their deadline to answer, move, or otherwise plead or defend as to the Complaint to February 11, 2026.

DATED: January 23, 2026.

Respectfully Submitted,  
JACKSON LEWIS P.C.

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*Attorneys for Defendants Sanofi-Aventis US, Chattem, Inc., and Quten Research Institute, LLC*

**DECLARATION OF SERVICE**

I hereby certify that on the date set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I further certify that I caused the foregoing document to be served on the following non-CM/ECF participant by first-class mail and electronic mail (courtesy only):

Jorden Hollingsworth, *plaintiff pro se*  
PO Box 16142  
Portland, OR 97292

DATED: January 23, 2026.

By: *s/ Delores Petrich*  
Delores Petrich

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