

Anthony Copple, OSB #163651
anthony.copple@jacksonlewis.com
JACKSON LEWIS P.C.
200 SW Market St., Ste. 540
Portland, Oregon 97201
Tel: (503) 229-0404
Fax: (503) 229-0405

Helen E. Tuttle (*pro hac vice* pending)
helen.tuttle@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH LLP
600 Campus Drive
Florham Park, New Jersey 07932
Tel: (973) 549-7000
Fax: (973) 360-9831

*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.¹

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, 2026.²

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

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

² 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.

By: s/ Anthony Copple
Anthony Copple, OSB #163651
anthony.copple@jacksonlewis.com

Helen E. Tuttle (*pro hac vice* pending)
Faegre Drinker Biddle & Reath LLP
helen.tuttle@faegredrinker.com

*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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