

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JAMES BULL, on behalf of himself and others similarly situated,)	
)	
)	Case No. 1:14-cv-05789
Plaintiff,)	
)	Judge Rebecca R. Pallmeyer
v.)	
)	Magistrate Judge Daniel G. Martin
US COACHWAYS, INC.,)	
)	
Defendant.)	
)	

PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF CLASS DEADLINES

Without opposition from defendant U.S. Coachways, Inc., (“Defendant” or US Coachways”) Plaintiff James Bull (“Plaintiff”) respectfully moves the Court for an extension of the deadlines set by the Court in its Preliminary Approval Order on March 17, 2016 (Dkt. 76). As grounds for the Motion, Plaintiff states that the Parties’ Settlement Agreement and the Court’s Preliminary Approval Order provided that Plaintiff would disseminate notice to the class primarily via email addresses culled from US Coachways’ records as a means to minimize the notice expense to the class.

US Coachways had unforeseen difficulties in obtaining its customer records from various third party vendors it has utilized to store its customer information, and had to retrieve a subset of those records from a vendor in Bulgaria, which it has now done. The email information is still not complete for all class members, although US Coachways has identified an additional third party, LeadMasters, LLC., which it believes has US Coachways’ Customer Relationship Management data (“CRM data”) which may contain additional email addresses for class members. Plaintiff has served a subpoena to LeadMasters, LLC. to obtain this data, and asks the

Court for additional time to allow gathering of information to effectuate notice via email as originally contemplated in the Preliminary Approval Order.

Accordingly, Plaintiff asks the Court to revoke the deadlines set forth in the Preliminary Approval Order and to set a status conference in thirty days to allow the Parties to report in on their progress in obtaining additional email addresses, and to set new deadlines in the case, including issuance of notice, an objection and exclusion deadline, a due date for a motion for final approval and setting a new date for a Final Approval Hearing.

Respectfully submitted,

PLAINTIFF JAMES BULL individually and on behalf of
a class of all persons and entities similarly situated,
By his attorneys,

Dated: May 3, 2016

/s/ Anthony I. Paronich

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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2016, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Anthony I. Paronich _____