UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: ARC AIRBAG INFLATORS PRODUCT LIABILITY LITIGATION	MDL No. 3051 Case No. 1:22-md-03051-TWT District Judge Thomas W. Thrash

CONSENT MOTION TO EXTEND TIME TO ANSWER PLAINTIFFS' CORRECTED CONSOLIDATED CLASS ACTION COMPLAINT [ECF NO. 157 AND 157-1]

Defendants BMW of North America, LLC; BMW Manufacturing Co. LLC; FCA US LLC; Ford Motor Company; General Motors LLC; Porsche Cars North America, Inc.; Volkswagen Group of America, Inc.; Hyundai Motor America; Kia America, Inc.; Autoliv, Inc.; Autoliv ASP, Inc.; Key Safety Systems, Inc. d/b/a Joyson Safety Systems; TG Missouri Corporation; ZF Active Safety and Electronics US LLC; ZF Passive Safety Systems US Inc.; ZF Automotive US Inc.; ZF TRW Automotive Holdings Corp.; and ARC Automotive, Inc. (collectively, "Defendants"), by and through their respective undersigned counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, respectfully move this Court for an extension and/or enlargement of time to answer Plaintiffs' Corrected Consolidated Class Action Complaint [ECF No. 157 and 157-1] ("Second Amended Complaint"). Plaintiffs have informed the undersigned that Plaintiffs do not oppose the relief sought in Defendants' motion.

In support of this motion, Defendants respectfully state as follows:

1. Plaintiffs filed their Second Amended Complaint on August 28, 2023. The Second Amended Complaint is 1,513 pages in length and contains 4,176 numbered paragraphs of allegations.

2. On October 18, 2023, Defendants filed respective motions to dismiss Plaintiffs' Second Amended Complaint.

3. On October 2, 2026, this Court entered an Opinion and Order granting in part and denying in part Defendants' respective motions to dismiss.

4. Pursuant to a June 15, 2023 Case Management Order entered in this case, Defendants must file their respective answers to Plaintiffs' Second Amended Complaint by November 2, 2026 (i.e., "Within thirty (30) days of the Court's resolution of any motions to dismiss[.]"). [ECF No. 91]

5. Given the length and complexity of the Second Amended Complaint, Defendants respectfully request additional time to answer.

6. Accordingly, on October 19, 2026, counsel for the parties met and conferred and agreed, subject to the Court's approval, to extend the deadline for Defendants to file their respective answers to the Second Amended Complaint to December 2, 2026.

This request is made in good faith and not for the purpose of delay. Therefore, for good cause shown, Defendants respectfully request that the Court enter an order

extending the time for Defendants to answer the Second Amended Complaint until December 2, 2026.

A proposed order is attached.

Respectfully submitted this 28th day of October, 2026.

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned certified that the foregoing complies with the font and point selection permitted by Local Rule 5.1. This brief was prepared on a computer using Times New Roman font (14 point).

/s/ Michael B. Shortnacy
Michael B. Shortnacy

CERTIFICATE OF SERVICE

I certify that on October 28, 2026, a copy of the foregoing Consent Motion to Extend Time to Answer Plaintiffs' Corrected Consolidated Class Action Complaint [ECF No. 157 and 157-1] was served electronically through the Court's electronic filing system upon all parties appearing on the court's ECF service list.

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