Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991	)	CG Docket No. 02-278
	)	
Junk Fax Protection Act of 2005	)	CG Docket No. 05-338
	)	
Petitions for Declaratory Ruling and Retroactive Regarding the Commission's Opt-Out Notice Requirement for Faxes Sent with the Recipient's Prior Express Permission	)	Re: Waiver Request by the "RadNet Entities"

To: Office of the Secretary

Attention: The Commission
Consumer and Governmental Affairs Bureau

JOINT MOTION TO ALTER RESPONSIVE PLEADING DATES

Edward Simon, DC ("Simon") on the one hand, and RadNet Entities[1] (collectively "RadNet") "RadNet") respectfully request that the dates for responsive pleadings relative to Simon's September 28, 2015 Application for Review be modified. In support, the following is respectfully submitted.

Simon's Application for Review was filed on September 28, 2015. Pursuant to Section 1.115(d) of the Commission's rules, RadNet's responsive pleading is due on October 13, 2015 (i.e.

[1] Exhibit A attached hereto is a listing of the RadNet entities.

(i.e. fifteen (15) days after the filing of the application for review). Simon's reply would be due on October 23, 2015 (i.e. ten (10) days after the filing of the opposition).

In light of travel plans of counsel as well as other work commitments, it is requested that the responsive pleadings dates be modified as follows:

- RadNet responsive submission due date: October 23, 2015
- Simon and Affiliated Reply due date: November 12, 2015

It is submitted that a grant of the request would not prejudice any party. Moreover, it would be in the public interest since it would allow adequate time for the parties to provide a full and complete discussion of the pertinent issues.

Counsel for RadNet has been contacted concerning the instant motion and has authorized the undersigned to state that RadNet joins in the motion.

October 6, 2015

Respectfully submitted,

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One of its Attorneys for Edward Simon, DC
and Affiliated Health Care Associates, P.C.

Exhibit A
Radnet Entities

California

Radnet Management, Inc.

Valley Imaging Partners, Inc.

Beverly Radiology Medical Group

Breastlink Medical Group, Inc.

Truxtun Radiology Medical Group, L.P.

Maryland

Advanced Imaging Partners, Inc.

Community Imaging Partners, Inc.

American Radiology Services, LLC

Florida

Treasure Coast Imaging Partners, Inc.

New Jersey

New Jersey Imaging Partners , Inc.

New Jersey Imaging Network, LLC

Garden State Radiology Network, LLC

Garden State Radiology Associates, P.A

New York

Mid Rockland Imaging Partners, Inc.

Ide Imaging Partners, Inc.

Lenox Hill Radiology and Medical Imaging Associates, P.C.

Medical Imaging of Manhattan, LLC

Beranbaum, Khilnani, Neistadt, Jacobs, Hertz & Sherman, M.D., P.C.

Manhattan Diagnostic Radiology

Delaware

Delaware Imaging Partners, Inc.

Exhibit A
Radnet Entities

Rhode Island

Healthcare Rhode Island, LLC

CERTIFICATE OF SERVICE

I, Malinda Markland, do hereby certify that copies of the foregoing "Joint Motion to Alter Responsive Pleading Dates" were sent on this 7th day of October, 2015, via US mail, to the following:

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