

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

LISA SYKES and SETH SYKES,
individually and as parents and
natural guardian of Wesley Alexander Sykes,
a minor child,

Plaintiffs,

v.

Case No. 3:07CV660

BAYER HEALTHCARE
CORPORATION,

Defendant.

PLAINTIFFS' MOTION FOR LEAVE
TO FILE AMENDED COMPLAINT

COMES NOW the undersigned counsel for Plaintiffs, Clifford J. Shoemaker, and moves this Honorable Court for leave to amend the complaint filed herein in order to more clearly set forth state law causes of action against the defendant and to add other defendants.

Attached to this motion is a proposed amended complaint. The Court has the authority to grant this relief.

WHEREFORE, Plaintiffs respectfully request leave of Court to file an amended complaint and to add defendants.

Respectfully submitted
this 22nd day of January, 2008.

LISA SYKES, et al.

/s/Clifford J. Shoemaker
Clifford J. Shoemaker
Attorney for Lisa Sykes, et al.
Va. Bar No. 17142

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2008, I will electronically file the foregoing with the Clerk of Court using the *CMIECF* system, which will then send notification of such filing to the following:

**Bayer Pharmaceuticals
Corporation**
*Individually and as Successor-In-
Interest to Miles, Inc.
formerly known as
Bayer Corporation*

represented by **David Alan Rudlin**
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