## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

VOLTAGE PICTURES, LLC  Plaintiff,	) ) ) ) Civil Action No.1:10-CV-00873-RMU
V.	)
DOES 1-5,000,	) )
Defendant.	) ) )

## DEFENDANTS UNCONTESTED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO FILE ITS REPLY MEMORANDUM IN RESPONSE TO PLAINTIFF'S MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO QUASH/MOTION TO DISMISS

Moving Defendants, hereby respectfully move this Court, pursuant to Fed. R. Civ. P. 7(b) for entry of the attached Order extending the time for the Moving Defendants to file its Reply Memorandum in response to the Plaintiff's Opposition to the Defendants' Motion to Quash/Motion to Dismiss. For its reasons, the Moving Defendants rely upon the following authority:

- 1. Due to the complexities of this case, including the fact that numerous unnamed Doe Defendants have been served, the Plaintiff has preemptively filed its response motion, only two days after the Moving Defendant's initial filing.
- 2. At this time, the Moving Defendants are unable to respond within the seven (7) day window accorded by LCvR 7.
- 3. All parties, including the Plaintiff, have agreed that an extension of time would not be

unreasonable. Furthermore, because the Court has not had an opportunity to process each of the initial requests in this, and a factually-similar case also before this Court,<sup>1</sup> the Moving Defendants are concerned that their Reply Motion may not be processed in time to meet the seven (7) day Reply deadline under LCvR 7(d), and hereby request an extension of time to November 5, 2010 to file a reply.

## **Statement of Compliance with LCvR 7 (m)**

Pursuant to LCvR 7(m), Moving Defendants discussed this motion with Plaintiff's counsel by telephone on October 25, and counsel for the Plaintiff advised the Moving Defendants that it would have no objection to a brief extension of time for the Moving Defendants to file its Reply Memorandum.

Wherefore, Defendant respectfully requests the entry of the attached Order granting the Moving Defendants an extension of time to November 5, 2010, for the filing of its Reply Memorandum in response to the Plaintiff's Memorandum of Points and Authorities in Opposition to the Defendant's Omnibus Motion to Quash & Dismiss.

Dated this 2\_day of October, 2010

Respectfully submitted,

By \_/s/\_Carey N. Lening\_\_\_\_ Carey N. Lening, Esq. D.C. Bar No. 449284 Law Office of Carey N. Lening, Esq. 1325 G St. NW Ste 500 Washington, D.C. 20005 Telephone: 202-709-4529

Facsimile: 888-525-4423

<sup>1</sup> The case in reference is <u>Call of the Wild Movie, LLC v. Does 1-1,062</u>, 1:10-cv-00455-RMU.

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Plaintiff,	) ) 
V.	) Civil Action No.1:10-CV-00873-RMU
DOES 1-5,000,	) )
Defendant.	) ) )
	[PROPOSED] ORDER
	[I KOI OSED] OKDEK
Before the Court is the Moving I	Defendants' Uncontested Motion for a an Extension of Time
to File the Moving Defendants' Reply to	Plaintiff's Memorandum in Opposition to Moving
Defendants' Omnibus Motion to Quash	/Motion to Dismiss. Upon review of the motion and the
entire record it is ORDERED that the mo	otion is GRANTED and the deadline for the Moving
Defendants to file a Reply Motion is here	eby extended to November 5, 2010.
Data	
Date:	Ricardo M. Urbina
	United States District Judge