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5		
6	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA	
7		01 01 1111111111111
	K-BEECH, INC.,	
8	DI : .:cc	Case No. 2:11-cv-01601-FJM
9	Plaintiff,	PLAINTIFF'S MOTION FOR
10	v.	ENLARGEMENT OF TIME TO
10		ANSWER DEFENDANT'S MARC
11	MARC PUSKAS AND DAVID BROOKHOUSER,	PUSKAS COUNTERCLAIM
12	DAVID BROOKHOUSER,	
12	Defendants.	
13		
14	Plaintiff, K-Beech, Inc., moves for the entry of an Order granting its Motion for	
15	Enlargement of Time to answer Defendant, Marc Puskas' ("Defendant") Counterclaim	
16	and as grounds states as follows:	
17	1. Plaintiff and Defendant have agreed on the material settlement terms to	
18	sottle the underlying eleims	
19	settle the underlying claims.	
20	2. Plaintiff and Defendant are still in the process of concluding the terms and language of the settlement agreement which will require the dismissal with prejudice of	
21		
22	all claims asserted against each other in this litigation.	
23		
24	1	

1	3. Plaintiff respectfully requests that the time within it must file an answer to	
2	Defendant's Counterclaim be extended until March 30 th , 2012, because said answer will	
3	very likely be unnecessary.	
4	4. Undersigned counsel has conferred with Defendant's counsel, Richard H.	
5	Flaaen, who expressly authorized undersigned to inform the Court that Defendant does	
6	not object to the Court granting the requested relief.	
7	5. None of the parties will be prejudiced should the Court enter an order	
8	granting the relief sought herein.	
9	6. Good cause exists to grant this Motion.	
10	WHEREFORE, Plaintiff respectfully requests that the time within it must file	
11	an answer to Defendant's Counterclaim be extended until March 30 th , 2012. A proposed	
12		
13	order is attached.	
14	DATED this 21 st day of March, 2012.	
15	Respectfully submitted,	
16	<u>/s/ Ryan J. Stevens</u> Ryan J. Stevens	
17	AZ Bar No. 026378	
18	STEVENS LAW OFFICE, PLC 309 N. Humphreys Street, Suite 2	
19	Flagstaff, Arizona 86001 Telephone: (928) 226-0165	
20	Facsimile: (928) 752-8111 Email: stevens@flagstaff-lawyer.com	
21	Attorney for Plaintiff	
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24		

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2012 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

/s/ Ryan J. Stevens Ryan J. Stevens