

FILED  
U.S. DISTRICT COURT  
DISTRICT OF COLORADO

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

2012 SEP 14 PM 3:33

JEFFREY P. COLWELL  
CLERK

Civil Action No.: 1:12-cv-01873-RBJ-MEH

BY \_\_\_\_\_ DEP. CLK

Malibu Media  
Plaintiff,

v.

Lindsey V. Maness, Jr.,  
Defendant.

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**STIPULATED MOTION TO EXTEND TIME TO ANSWER OR  
OTHERWISE RESPOND TO COMPLAINT**

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Defendant, Lindsey V. Maness, Jr., hereby requests that this Court extend the time in which to answer or otherwise respond to the Complaint in this matter. As grounds for this motion, the Defendant states as follows:

**Certificate of Compliance with D.C.Colo.LCivR 7.1**

Pursuant to D.C.Colo.LCivR. 7.1(A), Defendant has conferred with Plaintiff's counsel concerning the stipulated relief sought herein and he does not object.

1. Plaintiff served Defendant with the Summons and Complaint in this matter on or about 2012-08-26. A formal answer is due 2012-09-17.
2. Defendant, despite consistent good faith efforts, has not yet been able to secure counsel in this matter.

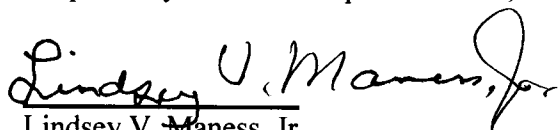
3. Due to this inability to secure counsel, Defendant has not been able to evaluate the factual and legal basis for Plaintiff's claims as well as understand all potential affirmative defenses and counterclaims that he may assert.

4. Defendant, without the requested extension, will be forced to answer the Complaint and assert affirmative defenses and counterclaims in a *pro se* manner which he believes will significantly prejudice his rights.

5. Fed. Rule Civ. Proc. 4 and D.Colo.L.Civ.R. 6.1(C) permits this Court to extend the time in which to file and answer or otherwise respond. No prior extensions have been granted to Defendant Lindsey V. Maness, Jr., to respond to the Complaint. This request is based on good cause and is not believed to prejudice the Plaintiff.

**WHEREFORE**, the Defendant Lindsey V. Maness, Jr., requests that this Court issue an order extending the time to answer or otherwise respond to Plaintiff's complaint for 30 days to and including 2012-10-17.

Respectfully submitted September 14th, 2012.

  
Lindsey V. Maness, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**, was served by email on this 14<sup>th</sup> day of September, 2012 upon the following counsel:

Jason Kotzker  
Kotzker Law Group  
9609 S University Blvd., #632134  
Highlands Ranch, CO 80163

/Lindsey V. Maness, Jr./  
Lindsey V. Maness, Jr.