## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

MALIBU MEDIA, LLC,	)
Plaintiff,	) Civil Case No.: <u>1:12-cv-22768-PAS</u>
v.	)
LEO PELIZZO,	)
Defendant.	)
	)

## UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES [DKT. 24]

Plaintiff, Malibu Media, LLC, hereby moves for the entry of an order extending the time within which Plaintiff has to respond to Defendant's Answer and Affirmative Defenses, and states:

- 1. On February 22, 2013, Defendant filed his Answer and Affirmative Defenses [Dkt. 24]. Plaintiff's response is due today, March 15, 2013.
- 2. Undersigned counsel has been in Philadelphia, PA all week, taking numerous depositions in an unrelated matter.
- 3. Undersigned requires two (2) additional days within which to properly prepare and file its response to Defendant's Answer and Affirmative Defenses.
  - 4. Defendant will not be prejudiced by the granting of this extension.
- 5. Plaintiff has conferred with counsel for Defendant, who has advised that his client does not oppose the relief requested herein.

WHEREFORE, Plaintiff respectfully requests that the time within which it must respond to Defendant's Answer and Affirmative Defenses [Dkt. 24] be extended until next Tuesday, March 19, 2013. A proposed order is attached for the Court's convenience.

Dated: March 15, 2013

Respectfully submitted,

By: /s/ M. Keith Lipscomb
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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2013, 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.

By: /s/ M. Keith Lipscomb