

Bowles Crow Lutzer & Newman LLP

54 West 21st Street, Suite 1007
New York, New York 10010
tel: 646.419.4264 fax: 866.844.8305
www.bowlescrow.com

Samantha H. Lutzer
Attorney at Law
646.374.0352
sam@bowlescrow.com

New York
Los Angeles

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BY FEDERAL EXPRESS

The Hon. Patty Shwartz
United States District Judge
USDC, District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room PO10
Newark, NJ 07101

AUG 31 2011

Re: Proposed Order for Additional Time to Serve John Doe Defendants
Patrick Collins, Inc. v. John Does 1-13; 2:11-cv-01470(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-10; 2:11-cv-01512(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-9; 2:11-cv-01513(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-21; 2:11-cv-01514(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-21; 2:11-cv-01483(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-10; 2:11-cv-01484(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-7; 2:11-cv-01478(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-7; 2:11-cv-01485(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-5; 2:11-cv-01486(FSH)(PS)
Patrick Collins, Inc. v. John Does 1-7; 2:11-cv-01517(FSH)(PS)

Dear Judge Shwartz:

On July 5, the Court granted my informal application to extend the deadline to serve the John Doe defendants in the above captioned matters. The deadline to serve the Summons and Complaint in these matters is now Monday **September 12, 2011**. The deadline to serve the Amended Complaint in *Patrick Collins, Inc. v. John Does 1-21; 2:11-cv-01514(FSH)(PS)* and *Patrick Collins, Inc. v. John Does 1-21; 2:11-cv-01483(FSH)(PS)* is **October 18, 2011**.

Plaintiff respectfully requests that the Court grant an additional 60 days to serve these John Doe defendants for the following reasons.

The Subpoenas we issued gave the Internet Service Providers ("ISPs") approximately 30 days to comply and had return dates of July 8, 2011 and August 23, 2011. Most of the ISPs did not comply with the deadlines and responded to these subpoenas within 35-45 days after we served them. In fact, Cablevision is responding to our So-Ordered subpoena with a return date of August 23, 2011 on September 2, 2011.

In any event, the ISPs provided their customers with an opportunity to object. During the objection period, many of these Doe defendants settled their claims and we are required to keep their names anonymous and out of the public record as long as these Does comply with the settlement agreements over the next 60 days. If that is the case, we will be filing notices of discontinuance against them. If not, we will need to serve them with process. Thus, we need the 60-day extension to preserve our right to name these Does and timely serve them.

Additionally, for Does whose identities are now known to us (and will continue to be made known to us on or about September 2, 2011), we have just begun settling claims and will continue to engage in settlement negotiations. To ensure anonymity and handle these matters in the most efficient manner, we need additional time to finalize any agreements and withdraw actions. Therefore, we also need the 60-day extension to preserve our rights against any non-settling Does to name these Does and timely serve them.

We thank the Court for its consideration of this matter.

Respectfully,

/s/
Samantha H. Lutzer (SE0898)