

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

ACHTE/NEUNTE BOLL KINO	:
BETEILIGUNGS GMBH & CO KG	:
	:
Plaintiff, v.	:
	:1:10-cv-00453-RMC
DOES 1-4,577	:
	:
Defendants.	:

MOTION TO EXTEND TIME TO FILE BRIEF

COMES NOW, Carey Lening, by and on behalf of defendant Samir El-Gindi (“Defendant”), and asks that this Court issue an order extending the deadline to file a motion in response to Plaintiff’s Opposition to Motion to Dismiss (Dkt. 109), pursuant to Fed. R. Civ. P. Rule 6(b).

Defendant is currently represented by Blair Chintella (“Chintella”). Carey Lening (“Lening”) has agreed to represent the Defendant as it pertains to filing the Motion to Quash/Motion To Dismiss (Dkt. 77) and the Reply to the Plaintiff’s Opposition motion (Dkt. ___), as Chintella is not barred in the District of Columbia. As of the date of this motion, Chintella wishes to solely represent the Defendant and wishes to file additional materials. He will be seeking *pro hac vice* status with this court in order to represent Defendant.

Lening communicated with opposing counsel Nicholas Kurtz on October 1, 2010, and Kurtz indicated that Plaintiff would likely not object to an extension of time.

The deadline for Defendant to respond to Plaintiff’s Opposition to Motion to Dismiss (Dkt. 109) is October 4, 2010.

WHEREFORE, defendant prays that this Court issue an order extending the deadline for Defendant for two weeks in order to permit Chintella to communicate with Defendant and determine how Defendant would like to proceed or obtain *pro hac vice* status in the District.

This 4th day of October, 2010.

/s/ Carey N. Lening

Carey Lening
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CERTIFICATE OF SERVICE

I am the attorney for Samir El-Gindi (“Defendant”). On October 4, 2010, I sent a true and complete copy of the foregoing Motion to Extend Time to File Brief to the following parties and/or their attorneys of record via United States mail:

Mr. Nicholas Kurtz
Dunlap, Grubb & Weaver, PLLC
199 Liberty St. S.W.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/Carey Lening
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