

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**COMBAT ZONE, INC.**

*Plaintiff,*

v.

**DOES 1 - 84 ,**

*Defendants.*

*Case No.: 3:12-cv-30085*

**PLAINTIFF'S CONSOLIDATED MOTION TO CONTINUE HEARING  
AND MEMORANDUM IN SUPPORT**

Now comes the Plaintiff in the above captioned matter and requests a continuance of a hearing scheduled for January 3<sup>rd</sup> to another date convenient to the Court. As reasons for the requested continuance the Plaintiff states as follows:

1. On January 3<sup>rd</sup>, Counsel for the Plaintiff is already scheduled to appear before Judge Saylor for status conferences. Third Degree Films v. Does 1 - 72, No. 1:12-cv-10760-FDS, ECF. No. 30 (D. Mass. Dec. 12, 2012); SBO Pictures v. Does 1 - 41, No. 1:12-cv-10804-FDS, ECF. No. 41 (D. Mass. Dec. 12, 2012); Third World Media, LLC v. Does 1 - 21, No. 1:12-cv-10947-FDS, ECF. No. 21 (D. Mass. Dec. 12, 2012); PW Productions, Inc. v. Does 1 - 19, No. 1:12-cv-10814-FDS, ECF. No. 24 (D. Mass. Dec. 12, 2012); Paradox Pictures v. Does 1 - 20, No. 1:12-cv-10815-FDS, ECF. No. 17 (D. Mass. Dec. 12, 2012); New Sensations, Inc. v. Does 1 - 175, No. 1:12-cv-11721-FDS, ECF. No. 13 (D. Mass. Dec. 12, 2012).

2. Even so, Counsel has contacted Judge Saylor's clerk to reschedule the above mentioned hearings to another date. Counsel has tried to re-schedule conflicts for that date during this last week but has been unsuccessful. The date, all-together, is not a feasible date for Counsel. Plans were made months ago for this date and involve multiple parties (not to mention January 3<sup>rd</sup> is Counsel's 30<sup>th</sup> birthday).

3. Additionally, considering the case load of Counsel, and the amount of time it would take to prepare for Judge Saylor's status conference (if not rescheduled), Counsel may not have reasonable amount of time to prepare for both hearings.

4. Counsel and Plaintiff have every intention of resolving the matter set for the hearing.

WHEREFORE, the Plaintiff asks the hearing be continued to any date after the first week in January, 2013.

Respectfully submitted,

*Dated:* December 20, 2012



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ATTORNEY FOR PLAINTIFF

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2012, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served via first-class mail to those indicated as non-registered participants.



Marvin Cable, Esq.

**DECLARATION OF PLAINTIFF'S COUNSEL**

I, Marvin Cable, counsel for the above-captioned Plaintiff declare under penalty of perjury that the above statements are true, and tried in good-faith to resolve scheduling conflicts for the January 3<sup>rd</sup> date.

*Dated:* December 20, 2012

A handwritten signature in black ink that reads "Marvin Cable". The signature is written in a cursive, flowing style.

Marvin Cable, Esq.