

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

**FLAVA WORKS, INC.,**

Plaintiff,

Case No: 1:10-cv-23834-PAS

vs.

**ROJE ON HOLIDAY INC.,** d/b/a Chocolate Drop  
Entertainment, d/b/a/ ChocolateDrop.com, d/b/a  
DawgPoundUsa.com, d/b/a DawgPoundUsa Media, d/b/a PapiThugz.com,  
d/b/a Thugzilla.com, AND  
**ANTHONY COLLINS, ROY COLLINS,  
LADON DODDS JR., AND M. KNIGHT,**

Defendants.

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**MOTION FOR AN EXTENSION OF TIME TO FILE JOINT SCHEDULING REPORT  
UNTIL PROPER SERVICE OF PROCESS HAS BEEN EFFECTUATED**

COMES NOW, the Plaintiff, Flava Works, Inc., by and through undersigned counsel, and hereby files its Motion for an Extension of Time to File Joint Scheduling Report until Proper Service of Process has been Effectuated and in support thereof states as follows:

1. This is a case for tortious interference with a contractual right, false designation of origin, violation of the RICO statute and unfair competition against the five (5) above-named Defendants.

2. On or about November 10, 2010, this Court issued an Order Requiring a Joint Scheduling Report [D.E. 9].

3. Is said JSR, this Court required that if the Plaintiff had not properly effectuated service at least forty (40) days after the date of said Order, that Plaintiff must file its motion for an extension of time to effectuate service and state the date service will be completed and when the JSR will be filed.

4. Plaintiff reasonably believes it can properly effectuate service on all Defendants within the next seventy-five (75) days, with the JSR filed within thirty (30) days thereafter.

WHEREFORE, Plaintiff respectfully requests this Court GRANT Plaintiff's Motion for an Extension of Time to File Joint Scheduling Report until Proper Service of Process has been Effectuated and/or any other relief this Court deems just and proper.

Date: January 19, 2011

Respectfully submitted,

By s/Jonathan J. Warrick  
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**PROPOSED ORDER GRANTING MOTION FOR AN EXTENSION OF TIME TO FILE  
JOINT SCHEDULING REPORT UNTIL PROPER SERVICE OF PROCESS HAS BEEN  
EFFECTUATED**

THIS CAUSE having come before the Court on the Plaintiff's Motion for an Extension of Time to File Joint Scheduling Report until Proper Service of Process has been Effectuated, this Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED: The Motion is GRANTED. Plaintiff shall have seventy-five (75) days from the date of this Order within which to effectuate service on each Defendant and the Joint Scheduling Report shall be due within thirty (30) days thereafter.

**DONE AND ORDERED** in Chambers, Miami, FL on this \_\_\_\_ Day of January, 2011.

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Honorable Judge Patricia Seitz

Copies: Counsel of Record