

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

FLAVA WORKS, INC.

Plaintiff,

CASE NO.: 10-CV-23834-SEITZ/O'SULLIVAN

v.

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

Defendants.

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**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME  
TO FILE REPLY TO PLAINTIFF'S RESPONSE TO MOTION TO DISMISS  
FOR LACK OF JURISDICTION (DOC. 50) AND PLAINTIFF'S RESPONSE TO  
MOTION TO DISMISS FOR FAILURE TO STATE CLAIM (DOC. 51)**

COME NOW Defendants, Anthony Collins ("A. Collins"), LaDon Dodds, Jr. ("L. Dodds"), Roy Collins ("R. Collins"), and Roje on Holiday, Inc. ("Roje"), (collectively "Defendants"), by and through their undersigned counsel, and hereby file this their Unopposed Motion for Enlargement of Time to File Reply to Plaintiff's Response to Motion to Dismiss for Lack of Jurisdiction (Doc. 50) and Motion to Dismiss for Failure to State a Claim (Doc. 51), and in support hereof, state as follows:

1. On December 6, 2011, Defendants filed their Motion to Dismiss for Lack of Jurisdiction (Doc. 44) and Motion to Dismiss for Failure to State a Claim (Doc. 45).

2. On January 3, 2012, Plaintiff filed its Response to Defendants' Motion to Dismiss for Lack of Jurisdiction. (Doc. 50). A Reply to the Response would have therefore been due on or about January 13, 2012.

3. On January 5, 2012, Plaintiff filed its Response to Defendants' Motion to Dismiss for Failure to State a Claim. (Doc. 51). A Reply to the Response would have therefore been due on or about January 16, 2012.

4. Counsel for Defendants contacted counsel for Plaintiff and was advised that Plaintiff would not oppose an enlargement of time to file a Reply to both Responses through and including January 20, 2012

5. No party would be prejudiced if the relief requested herein is granted.

WHEREFORE, Defendants respectfully request that this Court enlarge the time for filing a Reply to Plaintiff's Response to Motion to Dismiss for Lack of Jurisdiction (Doc. 50) and Motion to Dismiss for Failure to State a Claim (Doc. 51) through and including January 20, 2012.

DATED this 13<sup>th</sup> day of January 2012.

**ANDERSON | PINKARD**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 13th day of January, 2012, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will provide electronic notice of such filing to all counsel of record including Plaintiff's counsel as described below.

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