## 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.	

# <u>TO FILE MOTION FOR ENLARGEMENT OF TIME</u> <u>TO FILE MOTION FOR ATTORNEYS' FEES AND</u> <u>COSTS PURSUANT TO FED R. CIV. P. 54</u>

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 Motion for Attorneys' Fees and Costs pursuant to Fed. R. Civ. P. 54, and in support thereof, state as follows:

- 1. The Court's Order of June 5, 2012 (DE 93) granted Defendants' Motion for Enlargement of Time to file their Motion for Attorneys' Fees and Costs (DE 89) and the deadline for filing any such motion is presently June 14, 2012.
- 2. The parties are presently engaged in negotiations that are intended to resolve the issues that would otherwise be raised in the Motion for Attorneys' Fees and Costs and to avoid the necessity of filing such Motion.

3. The parties expect that they will be able to resolve the attorneys' fees and costs issue within ten (10) days of the date of this Motion and request a brief additional extension of time for Defendants to file their motion.

4. Plaintiff does not oppose this Motion and no party would be prejudiced if the relief requested herein is granted.

WHEREFORE, Defendants respectfully request that this Court enlarge the time for Defendants' filing of a Motion for Attorneys Fees and Costs such that the Motion does not become due until ten (10) days from the date of this Motion, or June 24, 2012.

DATED this 14<sup>th</sup> day of June, 2012.

### ANDERSON | PINKARD

/s/ Daniel W. Anderson, Esq. Daniel W. Anderson, Esq. Florida Bar No.: 490873 13577 Feather Sound Drive, Ste. 670 Clearwater, FL 33762-5532 Telephone: (727) 329-1999 Facsimile: (727) 329-1499

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## **CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

I hereby certify that counsel for the movant has conferred with all parties or non-parties who may be affected by the relief sought in this motion and can relate to the Court that there is no objection to the relief sought herein.

/s/ Daniel W. Anderson, Esq. Daniel W. Anderson, Esq. Florida Bar No.: 490873

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 14<sup>th</sup> day of June, 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.

Mirta Desir, Esq. 2610 N. Miami Ave. Miami, Florida 33127 mdesir@gmail.com

and

Stacy-Ann Floreth Frater, Esq. 1999 S.W. 27<sup>th</sup> Avenue, 1<sup>st</sup> Floor Miami, FL 33145 frater.stacyann@gmail.com

/s/ Daniel W. Anderson, Esq. Daniel W. Anderson, Esq. Florida Bar No.: 490873