

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Flava Works, Inc.,)	
)	
Plaintiff,)	Case No. 1:10-cv-06517
)	
v.)	
)	
Marques Rondale Gunter)	
d/b/a)	
mVidster.com, myVidster.com,)	
Salsaindy, LLC, et. al.)	
Defendants.)	

**PLAINTIFF’S MOTION FOR ENLARGMENT OF TIME TO COMPLETE
VOXEL DOT NET, INC. DISCOVERY**

Plaintiff, Flava Works, Inc., by and through its attorney, Meanith Huon, states as follows:

1. On or about April 5, 2012, the Court gave Plaintiff and Defendant, Voxel Dot Net, Inc. until August 14, 2012 to complete fact discovery. [Docket No. 143.]
2. Plaintiff timely served written discovery and notices of depositions on Voxel Dot Net, Inc.
3. Voxel Dot Net, Inc. agreed to produce the individuals whose depositions were noticed by Plaintiff after the August 14, 2012 via video conferencing or Skype, by agreement of the parties.
4. Thereafter, the parties entered into settlement discussions.
5. On or about August 13, 2012, Plaintiff agreed to an extension of time for Voxel Dot Net, Inc. to answer written discovery in light of the ongoing settlement discussions, subject to the condition that Voxel Dot Net, Inc. would answer written discovery if the parties could not settle the case.
6. On or about September 5, 2012, Defendant, Voxel Dot Net, Inc. tendered a

proposed document concerning the terms and conditions of any proposed settlement. The parties continue to negotiate over the terms and conditions of any proposed settlement.

7. Plaintiff requests that the Court extend the time to complete fact discovery with Defendant, Voxel Dot Net, Inc. to October 10, 2012, in the event that the parties are unable to settle this case.

8. This extension would give Defendant, Voxel Dot Net, Inc. time to answer written discovery and to produce the individuals whose depositions were timely noticed by Plaintiff should the parties not be able to settle this case with regard to Voxel Dot Net, Inc.

WHEREFORE, Plaintiff, Flava Works, Inc., requests that this Court extend the time to complete fact discovery with Defendant, Voxel Dot Net, Inc. to October 10, 2012.

DATED: September 5, 2012.

Respectfully Submitted,

By: /s/ Meanith Huon /s/
Meanith Huon

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NOTICE OF FILING

Please take notice that on or before September 5, 2012, Plaintiff, Flava Works, Inc., has filed the following documents or items:

**PLAINTIFF’S MOTION FOR ENLARGMENT OF TIME TO COMPLETE
VOXEL DOT NET, INC. DISCOVERY**

The documents or items have been or are being electronically served on all counsel of record for all parties.

Respectfully submitted,
/s/ Meanith Huon
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IL ARDC. No.: 6230996

