

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

Flava Works, Inc.,)	
)	
Plaintiff,)	Case No. 1:12-cv-01887
)	
v.)	
)	
Lloyd Johnson,)	
)	
Defendant.)	

**PLAINTIFF, FLAVA WORKS, INC.’S, MOTION FOR LEAVE TO
FILE PROPOSED THIRD AMENDED**

Now comes Plaintiff, Flava Works, Inc. (hereinafter “Flava Works”), by and through its attorneys, Meanith Huon and The Huon Law Firm, and states as follows:

1. This case was severed from Flava Works, Inc. v. Andrew Clavio, Case No. 11-cv-5100 in which Flava Works, Inc. had sued former paid members of its websites for copyright infringement.
 2. Plaintiff seeks leave to file a proposed Third Amended Complaint in lieu of Responding to the Section of Defendant’s Motion to Dismiss for Failure to State a Claim.
 3. FRCP 15 provides that “The court should freely give leave when justice so requires.”
 4. A copy of the proposed Third Amended Complaint is attached with Exhibits.
- WHEREFORE, Plaintiff requests that this Honorable Court grant Plaintiff leave to file the proposed Third Amended Complaint.

Respectfully submitted,

/s/ Meanith Huon

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CERTIFICATE OF SERVICE

Under penalties of law, I attest the following documents or items have been or are being electronically served on all counsel of record on or before September 4, 2012:

**PLAINTIFF, FLAVA WORKS, INC.'S, MOTION FOR LEAVE TO
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Respectfully submitted,
/s/ Meanith Huon
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