

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

LIBERTY MEDIA HOLDINGS, LLC,

Plaintiff,

v.

RYAN FRAGA,

Defendant.

Civil Action No. 11-cv-11789-WGY

**PLAINTIFF’S PARTIAL OPPOSITION TO DEFENDANT’S MOTION FOR AN  
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

The Plaintiff Liberty Media Holdings, LLC (“Liberty”) respectfully opposes, in part, defendant Ryan Fraga’s (“Defendant”) motion for 45 additional days to respond to the complaint. By November 29, 2011 — the date on which Defendant’s motion was apparently mailed to the Court — Defendant had already missed the deadline to Answer, and the Notice of Default had already entered. Thus, Defendant was already in default and is not entitled to additional time to Answer.

Liberty, however, does not oppose granting Defendant 45 days to retain counsel in order to assist him in filing a substantive opposition to the motion for a default judgment, as is his right per the Court’s standing order of November 16, 2011.

In the meantime, Liberty notes that its deadline to file the Motion for Default Judgment is December 16, 2011. Unless the Court instructs otherwise, Liberty intends to meet this deadline.

Dated: December 9, 2011

Respectfully submitted,

LIBERTY MEDIA HOLDINGS, LLC

By its attorneys,

/s/ Aaron Silverstein

Aaron Silverstein, Esq.

(BBO #660716)

SAUNDERS & SILVERSTEIN LLP

14 Cedar Street, Suite 224

Amesbury, MA 01913

P: 978-463-9100

F: 978-463-9109

E: asilverstein@massiplaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that December 9, 2011, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served via first-class mail to those indicated as non-registered participants. A copy of the foregoing document has been sent via first-class mail to Defendant at the following address:

Ryan Fraga  
19 Cortes Street, Apt. 10  
Boston, MA 02116

/s/ Aaron Silverstein

Aaron Silverstein