

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

LIBERTY MEDIA HOLDINGS, LLC	)	
	)	
<i>Plaintiff,</i>	)	CIVIL ACTION
	)	CASE NO. 1:11-cv-11789
v.	)	
	)	<b>LEAVE TO FILE GRANTED ON 2/23/2012</b>
RYAN FRAGA	)	
	)	
<i>Defendant.</i>	)	
	)	
	)	

**ASSENTED TO MOTION FOR CONTINUANCE OF FEBRUARY 24, 2012 SCHEDULING CONFERENCE AND MARCH 1, 2012 HEARING ON DEFENDANT'S MOTION TO DISMISS**

Defendant's counsel, Timothy Cornell, was retained on this date, February 23, 2012 and requires additional time to review the files and pleadings in the above-captioned case.

Furthermore, counsel has already conferred with Plaintiff's counsel, Aaron Silverstein, and counsel both agree that the parties may now confer on a discovery schedule, as required under Rule 16 of the Federal Rules of Civil Procedure, and that a continuance would further the interest of judicial economy because it will likely lead to a narrowing of the issues.

Accordingly, Defendant's counsel respectfully requests continuances for the hearings scheduled for February 24, 2012, a scheduling conference, and for March 1, 2012, a hearing on Defendant's Motion to Dismiss.

Respectfully submitted,

/s/ Timothy Cornell

Boston, Massachusetts  
February 23, 2012

Timothy Cornell (BBO#654412)  
Perry, Krumsiek & Jack LLP  
101 Arch Street  
Boston, MA 02110  
(617) 720-4300  
[tcornell@pkjlaw.com](mailto:tcornell@pkjlaw.com)

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Pursuant to Local Rule 7.1(a)(2), I, Timothy Cornell, counsel for the Defendant in the above-captioned matter, certify that on February 23, 2012, I conferred with Plaintiff's counsel, and together we have agreed on the motion submitted above.

Respectfully submitted,

/s/ Timothy Cornell

Boston, Massachusetts  
February 23, 2012

Timothy Cornell (BBO#654412)  
Perry, Krumsiek & Jack LLP  
101 Arch Street  
Boston, MA 02110  
(617) 720-4300  
[tcornell@pkjlaw.com](mailto:tcornell@pkjlaw.com)

**CERTIFICATION OF SERVICE**

I, Timothy Cornell, certify that this document filed through the ECF system will be sent electronically to the opposing counsel on the Notice of Electronic Filing.

Respectfully submitted,

/s/ Timothy Cornell

Boston, Massachusetts  
February 23, 2012

Timothy Cornell (BBO#654412)  
Perry, Krumsiek & Jack LLP  
101 Arch Street  
Boston, MA 02110  
(617) 720-4300  
[tcornell@pkjlaw.com](mailto:tcornell@pkjlaw.com)