

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FIRST TIME VIDEOS LLC,

Plaintiff,

Case No. 6:12-cv-1493-ORL 36KRS (BES)

v.

PAUL OPPOLD,

Defendant.

**AGREED MOTION FOR AN EXTENSION OF TIME TO CONDUCT CASE
MANAGEMENT MEETING**

Plaintiff, FIRST TIME VIDEOS LLC respectfully requests that the Court grant a thirty (30) day extension of the parties' case management meeting deadline to December 12, 2012 and permit the parties to conduct the meeting telephonically. In support of this motion, the Plaintiff states as follows:

1. On November 8, 2012, Matthew T. Wasinger, counsel for the Plaintiff filed a Motion to Withdraw pursuant to Rule 2.03, Local Rules, Middle District of Florida, and in accordance with Rule 4-1.16(b) of the Florida Rules of Professional Conduct.

2. On August 1, 2012, the Court issued a Track Two Notice [DE # 5] that designated this action as a track two case for case management purposes set forth in Local Rule 3.05. The Case Management Conference in the above styled case was Ordered to occur on or before, November 12, 2012

3. That due to Counsel's Motion to Withdraw requesting 30 days for the Plaintiff to find new counsel, to ensure the parties are not adversely affected with regard to discovery, the

Case Management Conference should be conducted with Plaintiff's new counsel to avoid any unnecessary conflicts.

4. Given that Counsel for the Defendant is located in Jacksonville, Florida, and new counsel for the Plaintiff may be located outside of Jacksonville, to avoid unnecessary travel and costs the parties request the Case Management Conference be allowed to occur via telephone.

5. Opposing counsel has been contacted and agreed to the extension of time for the Case Management Conference to occur and a stay of discovery of 30 days to permit the Plaintiff to find new counsel.

WHEREFORE, for the reasons stated above, the Commission respectfully requests that the Court grant a thirty (30) day extension of the parties' case management meeting deadline to December 12, 2012 and permit the parties to conduct the meeting telephonically.

CERTIFICATE OF GOOD FAITH
COMPLIANCE WITH LOCAL RULE 3.01(G)

In accordance with Local Rule 3.01(g), the undersigned counsel conferred with counsel of record for the Defendant before filing of this motion as to their respective positions on the relief sought herein and Mr. Syfert agreed to the relief sought in this Motion.

Respectfully submitted,

By: /s/ Matthew T. Wasinger
Matthew T. Wasinger (Bar # 57873)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 8, 2012, all counsel of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document using the Court's CM/ECF system.

/s/ Matthew T. Wasinger
Matthew T. Wasinger