

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MALIBU MEDIA, LLC,	:	
	:	
Plaintiff	:	Civil Action No. 5:12-cv-02088
	:	
vs.	:	
	:	
JOHN DOES 1-22,	:	
	:	
Defendants	:	

**MOTION FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S
AMENDED COMPLAINT**

Defendant, John Doe No. 14, by and through counsel, Thad M. Gelsinger, Esquire, and Leisawitz Heller Abramowitch Phillips, P.C., moves this Honorable Court for an extension of time to respond to Plaintiff, Malibu Media, LLC’s, Amended Complaint. Defendant states the following in support of its motion:

1. Plaintiff, Malibu Media, LLC (“Plaintiff”), filed its Amended Complaint on or about November 2, 2012.
2. The Amended Complaint was served on Defendant, John Doe No. 14 (“Defendant”), on or about November 2, 2012.
3. A response to the Amended Complaint is due on or before November 16, 2012.
4. On or about November 16, 2012, Defendant, John Doe No. 13, filed a Motion for an Extension of Time to Respond to Plaintiff’s Amended Complaint. Defendant joins in that request.
5. Defendant has been preparing an appropriate response to Plaintiff’s Amended Complaint.
6. In light of the complexities of the issues involved in this matter, additional time is

required for Defendant's response to be complete.

7. This request is not for the purpose of delay.

8. To the contrary, the parties have already propounded discovery upon each other in furtherance of efficiently moving this matter through the judicial process

9. Defendant's counsel has attempted to contact Plaintiff's counsel to ascertain Plaintiff's position regarding this request, however, undersigned counsel did not receive a response as of the time of the filing of this motion.

10. None of the parties to this matter will be prejudiced by extending the time to respond.

11. Therefore, Defendant respectfully requests an extension through November 20, 2012 to respond to Plaintiff's Amended Complaint.

WHEREFORE, Defendant, John Doe No. 14, respectfully requests that this Honorable Court grant this Motion for Extension of Time to Respond to Plaintiff's Amended Complaint and enter the attached Proposed Order.

Respectfully Submitted

LEISAWITZ HELLER ABRAMOWITZ PHILLIPS, P.C.

Dated: November 16, 2012

BY: /s/ Thad M. Gelsinger
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