

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT INDIANA**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>1:12-cv-01117-WTL-MJD</u>
	)	
v.	)	
	)	
R. STEPHEN HINDS, TROY LAMB,	)	
MICHAEL HARRIS, ROBERT JOHNSON,	)	
MICHAEL HARRISON, JAMES DUNCAN,	)	
HOWARD MCDONALD, and JOHN DOE 10,	)	
	)	
Defendants.	)	
	)	

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**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO DEFENDANT MICHAEL HARRISON’S OBJECTIONS TO  
MAGISTRATE’S ORDER DENYING MOTION TO COMPEL DISCOVERY**

Plaintiff, Malibu Media, LLC (“Plaintiff”), by and through undersigned counsel hereby moves for the entry of an order granting Plaintiff a brief extension of time to file a response to Defendant Michael Harrison’s Objections to Magistrate’s Order Denying Motion to Compel Discovery (CM/ECF 180), and in support states:

1. On May 1, 2014, this Court entered its order denying Defendant’s Motion to Compel. (CM/ECF 179).
2. On, May 15, 2014, Defendant filed his Objections to Magistrate’s Order Denying Motion to Compel Discovery. (CM/ECF 180). Accordingly, Plaintiff’s Response is due by no later than today, May 29, 2014.
3. Plaintiff requires a brief extension until Monday, June 2, 2014 to complete its Response.
4. Plaintiff conferred with counsel for Defendant and was advised that Defendant cannot consent to but will not oppose the instant Motion.

5. This request is made in good faith and not made for the purpose of undue delay.

6. None of the parties would be prejudiced by the granting of the extension of time, and said extension would not interfere with any case management deadlines.

WHEREFORE, Plaintiff respectfully requests that the time within which it has to file its Response to Defendant's Objections (CM/ECF 180) be extended until June 2, 2014. A proposed order is attached for the Court's convenience.

Dated: May 29, 2014

Respectfully submitted,

NICOLETTI LAW, PLC

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*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2014, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Paul J. Nicoletti