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 7 Regan Media, Inc. and Judith Regan

8 UNITED STATES DISTRICT COURT  
 9 DISTRICT OF ARIZONA

10 JENNA MASSOLI p/k/a JENNA )  
 11 JAMESON, )  
 12 ) Plaintiff, )  
 13 vs. )  
 14 "REGAN MEDIA," and JUDITH )  
 15 REGAN, an individual, )  
 Defendants. )

No. CV 05-0854 PHX EHC

**DEFENDANTS/  
 COUNTERCLAIMANTS'  
 MOTION TO AMEND  
 COUNTERCLAIM**

16 \_\_\_\_\_ )  
 17 REGAN MEDIA, INC., a New York )  
 18 corporation, and JUDITH REGAN, an )  
 individual, )  
 19 Defendants/Counterclaimants, )  
 20 vs. )  
 21 JENNA MASSOLI p/k/a JENNA )  
 JAMESON, an individual, )  
 22 Plaintiff/Counterdefendant, )  
 23 and )  
 24 JAY GRDINA, an individual, )  
 25 Third-Party Counterdefendant. )  
 26 \_\_\_\_\_ )

(Assigned to the Honorable Earl H. Carroll)

1 Pursuant to Fed. R. Civ. P. 15(a) and this Court's June 20, 2005 Scheduling  
2 Order, Defendants/Counterclaimants Regan Media, Inc. ("Regan Media") and Judith  
3 Regan ("Judith Regan") (collectively, "Regan") respectfully request leave to file their  
4 Second Amended Counterclaim. Only recently did Plaintiff/Counterdefendant Jenna  
5 Massoli p/k/a Jenna Jameson ("Jameson") disclose the involvement of one of her  
6 corporations, Dolce Amore, Inc., in a transaction directly relevant to this dispute.  
7 Jameson's belated disclosure necessitates Regan's need to name Dolce Amore, Inc. as an  
8 additional counterdefendant. Pursuant to Local Rule 15.1(a)(1), a copy of the proposed  
9 Second Amended Counterclaim is attached as Exhibit A, with the text sought to be added  
10 underlined. Likewise, pursuant to Local Rule 15.1(a)(2), a signed, original Second  
11 Amended Counterclaim is lodged with the Clerk of Court. Finally, this Motion is  
12 supported by an accompanying Memorandum in Support of Defendants/Counterclaimants'  
13 Motion to Amend Counterclaim.  
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17 Respectfully submitted this 9<sup>th</sup> day of September, 2005.

18 STEPTOE & JOHNSON LLP

19  
20 By: /s/ David J. Bodney

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22 Dennis K. Blackhurst  
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Counterclaimants Regan Media, Inc. and  
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of September, 2005, I caused the attached document to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electric Filing to the following CM/ECF Registrants:

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I hereby certify that on the 9th day of September, 2005, I served the attached document by mail on the following, who are not registered participants of the CM/ECF System:

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