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6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF ARIZONA**

8 JENNA MASSOLI p/k/a JENNA JAMESON,

9 Plaintiff,

10 v.

11 "REGAN MEDIA," JUDITH REGAN, as an
 12 individual,

13 Defendant.

CV 05-0854 PHX EHC

**PLAINTIFF/
 COUNTERDEFENDANTS' MOTION
 FOR EXTENSION OF TIME WITHIN
 WHICH TO RESPOND TO
 DEFENDANTS/
 COUNTERCLAIMANT REGAN
 MEDIA'S SECOND MOTION TO
 COMPEL AND REQUEST FOR
 SANCTIONS**

14 **REGAN MEDIA, INC.**, a New York corporation,
 15 and JUDITH REGAN, an individual,

16 Defendants/Counterclaimants,

17 v.

18 JENNA MASSOLI, p/k/a JENNA JAMESON, an
 19 individual,

20 Plaintiff/Counterdefendant,

21 and

22 JAY GRDINA, an individual,

23 Third-Party Counterdefendant,

24 and

25 DOLCE AMORE, INC., a Colorado corporation,

26 Counterdefendant.

(First Request)

*(Assigned to the Honorable
 Earl H. Carroll)*

1 Pursuant to LRCiv 7.3, Rules of Practice of the United States District Court for the
2 District of Arizona, plaintiff Jenna Massoli, p/k/a Jenna Jameson and counterdefendants John
3 G. “Jay” Grdina and Dolce Amore, Inc. (collectively, “Plaintiffs”), by and through their
4 counsel undersigned, hereby submit this Motion for Extension of Time to Respond to
5 Defendant/Counterclaimant Regan Media’s Second Motion to Compel and Request for
6 Sanctions (“Motion to Compel”) and requests that this Court extend, until March 24, 2006,
7 the time within which Plaintiffs may file a Response to Defendants/Counterclaimant Regan
8 Media’s Second Motion to Compel and Request for Sanctions (“Motion to Compel”), for the
9 reason that on this date both of the firms representing Plaintiffs filed Applications to
10 Withdraw as Counsel (“Application” or “Applications to Withdraw”). As a result, Plaintiffs
11 will need additional time within which to prepare their Response to the Motion to Compel.

12 This Motion is supported by the attached Memorandum of Points and Authorities, as
13 well as the record in this case.

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 On March 7, 2006, the firm of Renaud Cook Drury Mesaros, PA (“RCDM”), current
16 counsel for Plaintiffs, as well as the firm of Lipsitz, Green, Fahringer, Roll, Salisbury &
17 Cambria, LLP current co-counsel for Plaintiffs, both filed Applications to Withdraw.

18 On that same date, the undersigned contacted counsel for Defendants/
19 Counterclaimants, advised counsel that RCDM would be withdrawing, and requested an
20 extension of time within which Plaintiffs could file a response to the Motion to Compel, due
21 to the pending withdrawal. That request was denied.

22 Accordingly, Plaintiffs ask this Court to grant an approximately two-week extension
23 within which they may file a response to the Motion to Compel, specifically, Plaintiffs
24 request until March 24, 2006. Such an extension will allow Plaintiffs to find new counsel,

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1 and allow that counsel to become familiar enough with the case to file an appropriate response
2 to the Motion to Compel.

3 DATED this 9th day of March, 2006.

4
5 RENAUD COOK DRURY MESAROS, PA

6
7 By: /s/ Roger W. Hall
8 James L. Blair
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11 One North Central, Suite 900
12 Phoenix, AZ 85004-4417
13 *Attorneys for Plaintiff/Counterdefendants*

14 The foregoing was filed electronically this
15 9th day of January, 2006.

16 COPY of the foregoing was hand-delivered
17 to the Honorable Earl H. Carroll on the 10th day
18 of January, 2006.

19 COPY of the foregoing mailed this 9th
20 day of January, 2006, to:

21 David J. Bodney, Esq.
22 Dennis K. Blackhurst, Esq.
23 STEPTOE & JOHNSON, LLP
24 Collier Center
25 201 East Washington Street, Ste 1600
26 Phoenix, AZ 85004-2382
Attorneys for Defendants/Counterclaimants

27 /s/ Deborah Robertson