

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS**

<b>Robert Steinbuch</b>	<b>: Index No.: 4-06 CV0000 620WRW</b>
<b>Plaintiff,</b>	<b>:</b>
	<b>:</b>
<b>-v-</b>	<b>:</b>
	<b>:</b>
<b>Jessica Cutler &amp; Hyperion Books &amp; Disney</b>	<b>:</b>
<b>Publishing Worldwide &amp; Home Box Office &amp;</b>	<b>:</b>
<b>Time Warner</b>	<b>:</b>
<b>Defendants.</b>	<b>:</b>

**PLAINTIFF’S MOTION FOR AN  
EXTENSION OF TIME UNTIL NOVEMBER 15, 2006  
TO FILE RESPONSE TO DEFENDANTS’ MOTIONS TO DISMISS**

Plaintiff law professor Robert Steinbuch moves this Court for an extension of time, up to and including November 15, 2006, to file his responses to Defendants’ Cutler, Hyperion Books, Disney Publishing Worldwide, Home Box Office, and Time Warner Motions to Dismiss.

On August 18, 2006 all five Defendants, Cutler, Hyperion Books, Disney Publishing Worldwide, Home Box Office, and Time Warner, filed Motions to Dismiss.

Plaintiff’s counsel is a sole practitioner. All of the Defendants are represented by large law firms. There are eight attorneys of record for the Defendants, in addition to the extensive resources of their respective law firms. One lawyer is counsel for plaintiff. Given Counsel for Plaintiff’s workload, this Motion is not made for delay or for any other improper purpose, and good cause exists for extending the time to file Plaintiff’s response.

When the Defendants requested that Plaintiff’s Counsel consent to an extension of time to file a response to the Complaint filed in this action, he, of course, as a matter of

professional courtesy graciously granted the Defendants' requests. See attached Exhibits A and B. It is unfortunate that neither Counsel for Defendants Cutler, Hyperion, and Disney nor Counsel for Defendants Home Box Office and Time Warner would reciprocate that professional courtesy and consent to Plaintiff's similar request.<sup>1</sup>

Given that the Motions to Dismiss is a potentially dispositive motion, that all five Defendants moved to dismiss, and that the Plaintiff's Counsel is a sole practitioner, Plaintiff law professor Robert Steinbuch moves this Court for an extension of time, up to and including November 15, 2006, to file his responses to Defendants' Cutler, Hyperion Books, Disney Publishing Worldwide, Home Box Office, and Time Warner Motions to Dismiss.

Dated: August 22, 2006

/s/ Jonathan Rosen  
Jonathan Rosen, Esq.  
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Attorney for Plaintiff

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<sup>1</sup> Counsel for Defendants Cutler, Hyperion Books, Disney would not grant their consent to this request unless Plaintiff submitted to Defendant's extortionary demands to waive his rights to discovery. Counsel for Defendants Home Box Office and Time Warner would only consent to a 40 day extension and made similar extortionary demands for any time thereafter.

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

**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2006, I presented the foregoing to the Clerk of Court for filing and uploading to the CM/ECF system, which shall send notification of such filing to the following:

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