

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

ROBERT STEINBUCH

PLAINTIFF

v.

No. 4-08-CV-000456GTE

HACHETTE BOOK GROUP

DEFENDANT

MOTION FOR EXTENSION OF TIME TO PLEAD

Defendant Hachette Book Group, Inc. (erroneously designated in the complaint as Hachette Book Group, a/k/a Hatchette Book Group), for its motion for extension of time to plead, states:

1. Hachette Book Group, Inc. (“Hachette”) received a copy of the plaintiff’s complaint and summons on September 10, 2008.
2. Hachette expressly reserves its right to raise the defense of improper service in its responsive pleading. However, assuming that service was proper, Hachette’s answer or other response to the plaintiff’s complaint is due on or before Tuesday, September 30, 2008.
3. Hachette requests an extension of time to answer or otherwise respond to the plaintiff’s complaint, up to and including Tuesday, October 14, 2008.
4. Hachette conferred with plaintiff, who is proceeding *pro se*, regarding this request, and the plaintiff’s response to that request is attached hereto as Exhibit A.

5. Hachette will not object to plaintiff's request for an extension of time to respond to a motion filed by Hachette in response to the plaintiff's complaint as expressed by the plaintiff in Exhibit A.

6. This motion does not seek any affirmative relief, and by filing this motion Hachette does not waive any defenses it may have, including, but not limited to, improper service and lack of personal jurisdiction.

WHEREFORE, defendant Hachette Book Group respectfully requests an extension of time up to and including October 14, 2008 in which to answer or otherwise respond to plaintiff's complaint.

WILLIAMS & ANDERSON PLC
Twenty-Second Floor
111 Center Street
Little Rock, AR 72201
501.372.0800

By: /s/ Clayborne S. Stone
Philip S. Anderson, Ark. Bar. No. 60001
Clayborne S. Stone, Ark. Bar No. 2003102
P. Andrew King, Ark. Bar No. 2007176

Attorneys for Defendant Hachette Book Group

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of September, 2008, a copy of the foregoing motion was served on all counsel of record via this Court's CM/ECF system and a copy has been served via U.S. Mail and electronic mail upon:

Robert Steinbuch, Esquire
6834 Cantrell Road, #222
Little Rock, AR 72207
robertsteinbuch@gmail.com

/s/ Clayborne S. Stone