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7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA
9 WESTERN DIVISION

11 MARK MISHAK, d/b/a
INEEDATV.COM,

12 Plaintiff,

13 v.

14 GOOGLE, INC., et al.,

15 Defendant.

Case No. CV07-8258 CAS (JCRx)

**STIPULATION EXTENDING TIME FOR
DEFENDANT LYCOS, INC. TO
ANSWER OR OTHERWISE PLEAD IN
RESPONSE TO PLAINTIFF'S
COMPLAINT**

Current Answer/Response Date:
January 17, 2008

Proposed Answer/Response Date:
February 19, 2008

The Honorable Christina A. Snyder

19
20 **RECITALS**

21 1. Plaintiff Mark Mishak d/b/a INEEDATV.com ("Plaintiff") filed this
22 action on December 20, 2007.

23 2. Under Fed. R. Civ. P. 12, defendant Lycos, Inc.'s ("Defendant")
24 responsive pleading is currently due on or before January 17, 2008.

25 3. This is an action asserting multiple statutory and common law claims
26 against Defendant (and numerous other defendants). Specifically, the Complaint,
27 consisting of 128 paragraphs over 24-pages, purports to assert claims for (1)
28 violations of the Lanham Act, 15 U.S.C. §§ 1111 *et seq.*, (2) New York General

1 Business Law, § 360-1; (3) trademark infringement; (4) unfair competition; and (5)
2 tortious interference with prospective business advantage. In addition, the
3 Complaint also seeks a variety of legal remedies, including damages and injunctive
4 relief.

5 4. Against this background, counsel for Defendant requires a brief 30-day
6 extension of the current responsive pleading deadline, so that they may properly
7 investigate and respond to Plaintiff's allegations.

8 5. Plaintiff and Defendant therefore have stipulated to extend the time for
9 Defendant to answer or otherwise respond to the Complaint up to and including
10 February 19, 2008.

11 **STIPULATION**

12 Defendant Lycos, Inc., through its attorneys, and Plaintiff Mark Mishak d/b/a
13 INEEDATV.com, through his attorneys, hereby stipulate and agree that the time for
14 Defendant to answer or otherwise respond to the Complaint shall be extended up to
15 and including February 19, 2008, and request that this Court enter the accompanying
16 proposed order to that effect.

17
18 Respectfully submitted

19 Dated: January 17, 2008

/s/ Brooks R. Brown
Brooks R. Brown
GOODWIN PROCTER LLP

Attorneys for Defendant Lycos, Inc.

22
23
24 Dated: January 17, 2008

/s/ Roger James Agajanian
Roger James Agajanian
LAW OFFICES OF
ROGER JAMES AGAJANIAN

Attorney for Plaintiff

PROOF OF SERVICE

1
2 STATE OF CALIFORNIA)
3 COUNTY OF LOS ANGELES) SS.:

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action. My business address is 10250 Constellation Blvd., Los
6 Angeles, CA 90067.

7 On January 18, 2008, I served on the interested parties in said action the within:

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8 **STIPULATION EXTENDING TIME FOR DEFENDANT LYCOS, INC. TO ANSWER OR OTHERWISE
9 PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT**

10 by placing a true copy thereof in a sealed envelope(s) addressed as stated below and
11 causing such envelope(s) to be deposited in the U.S. Mail at Los Angeles, California.

12 Roger James Agajanian, Esq.
13 LAW OFFICE OF ROGER JAMES AGAJANIAN
14 The Waterford Building
15 2901 West Coast Highway
16 Suite 200
17 Newport Beach, CA 92663

Counsel for Plaintiff:
Mark Mishak d/b/a Ineedatv.com
Tel. 949-258-4347
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rogeragajanian@gmail.com

18 (MAIL) I am readily familiar with this firm's practice of collection and processing
19 correspondence for mailing. Under that practice it would be deposited with the U.S.
20 postal service on that same day in the ordinary course of business. I am aware that on
21 motion of party served, service is presumed invalid if postal cancellation date or postage
22 meter date is more than 1 day after date of deposit for mailing in affidavit.

23 (ELECTRONIC MAIL) I caused the above document(s) to be transmitted to the
24 office(s) of the addressee(s) listed above by electronic mail at the e-mail address(es) set
25 forth above pursuant to Fed.R.Civ.P.5(d)(1). "A Notice of Electronic Filing (NEF) is
26 generated automatically by the ECF system upon completion of an electronic filing. The
27 NEF, when e-mailed to the e-mail address of record in the case, shall constitute the
28 proof of service as required by Fed.R.Civ.P.5(d)(1). A copy of the NEF shall be attached
to any document served in the traditional manner upon any party appearing pro se."

I declare under penalty of perjury that I am employed in the office of a member of the bar
of this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on January 18, 2008, at Los Angeles, California.

Simone Robinson
[Type name]


(Signature)