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7 Attorneys for Plaintiff Pacific Information Resources, Inc.

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 Pacific Information Resources, Inc., a  
11 California Corporation,

12 Plaintiff,

13 vs.

14 SIMPLE COMMUNICATIONS, an Alabama  
15 corporation; WILLIAM TRAVIS SULLIVAN,  
16 individually, AND DOES 1 through 100,  
17 inclusive, WHOSE IDENTITIES ARE  
18 UNKNOWN,

19 Defendants.

) **CASE NO. CV-07-4131 MMC**

) **[Before the Honorable Maxine M.**  
20 **Chesney, Courtroom 7]**

) **PLAINTIFF’S REQUEST TO**  
21 **CONTINUE DATE FOR FILING**  
22 **MOTION FOR DEFAULT JUDGMENT**  
23 **AGAINST WILLIAM TRAVIS**  
24 **SULLIVAN AND SIMPLE**  
25 **COMMUNICATIONS; ORDER THEREON**

) Complaint Filed: August 9, 2007  
26 Discovery Cut-Off: N/A  
27 Trial: N/A  
28 Status Conference: February 8, 2008

29 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR**  
30 **ATTORNEYS OF RECORD HEREIN:**

31 Plaintiff Pacific Information Resources, Inc. (“Plaintiff”) hereby requests a continuance  
32 of the Court to file its Default Judgment Application on February 15, 2008 instead of on  
33 February 1, 2008. Plaintiff makes this request on the basis of good cause:  
34  
35  
36  
37

38 **Request to Continue Date for Filing Motion for Default Judgment**  
**Case No. CV-07-4131**

pacific information resources\pleadings\sullivan and simple communications\req to cont date for def judg final as filed 01 31 08

- 1 1. Plaintiff is filing two Motion for Summary Judgment Opposition Briefs tomorrow
- 2 in this same court on the Main Action (Pacific Information Resources v
- 3 Musselman, Case No. 06-2306 MMC;
- 4 2. Plaintiff is filing two Motions for Summary Judgment next week in the Main
- 5 Action (Pacific Information Resources v Musselman, Case No. 06-2306 MMC;
- 6 3. Extrapolating the voluminous data necessary to support the Default Judgement
- 7 which will be in excess of \$3 million has taken much, much more time than
- 8 anticipated; and
- 9 4. One of Plaintiff's experts, Professor Ran Hadas, is teaching and researching at the
- 10 University of Sydney in Australia until July, 2008. Thus, coordinating with
- 11 Professor Hadas has been an extremely time consuming and logistical challenge.

12 Plaintiff assures the Court there will be no further requests for a continuance of this  
 13 matter.

14 There will be no prejudice to any party who has direct or related interest in this case,  
 15 including those parties who are Defendants in the related case noted herein.

16 Plaintiff humbly requests this final extension in order to properly comply with all  
 17 statutory and local criteria for granting the Default Judgment Application.

18 Respectfully submitted,

19 DATED: January 31, 2008

**NOVO LAW GROUP, P.C.**

20  
 21 BY: /s/Konrad L. Trope, Esq.  
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 INFORMATION RESOURCES,  
 26 INC.

~~PROPOSED~~ ORDER

Plaintiff Pacific Information Resources has hereby requested continuance to file its Defaults Judgment Application against Defendants William Travis Sullivan and Simple Communications to February 15, 2008.

Having considered the requested extension, good cause appearing, therefore, and no prejudice any parties appearing, IT IS HEREBY ORDERED that:

Plaintiff shall file its Application for Default Judgment not later than February 15, 2008. Further, the Case Management Conference is CONTINUED from February 8, 2008 to May 2, 2008.

Dated: February 4, 2008

*Maxine M. Cheney*  
Honorable MAXINE M. CHENEY  
United States District Judge