

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:09-CV-00636-REB-KLM

VIDEO PROFESSOR, INC.
Plaintiff,

v.

AMAZON.COM, INC.
Defendant.

STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant, Amazon.com, Inc., (“Amazon”) by and through its counsel Faegre & Benson LLP, hereby moves pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6.1(B) for an extension of time up to and including May 15, 2009, to answer, move, or otherwise respond to the Complaint filed by the Plaintiff. The grounds for the motion are as follows:

1. Pursuant to Local Rule 7.1, counsel certifies that he has conferred with counsel for the Plaintiff who stipulates to the extension requested in this Motion.

2. No previous extensions of time have been obtained either by filed stipulation under Local Rule 6.1(A) or by motion under Local Rule 6.1(C).

3. Amazon just retained counsel to represent it in this matter on April 30, 2009. Amazon requests this brief extension to allow its counsel sufficient time to investigate the matter and prepare Amazon’s response to Plaintiff’s Complaint.

4. The requested extension of time is not sought for any improper purpose or for purposes of unreasonable delay. Good cause exists for such an extension to allow Amazon's newly engaged counsel sufficient time to investigate the matter and prepare its response.

5. No prejudice will arise from this extension as no discovery or other proceedings have begun in this case.

6. Pursuant to Local Rule 6.1(E), the undersigned counsel certifies that a copy of this motion has been served on Plaintiff, and all counsel of record.

WHEREFORE, Defendant respectfully requests that the Court enter an order extending the time for it to respond to Plaintiff's Complaint up to and including May 15, 2009.

Dated: May 1, 2009

Respectfully Submitted,

s/Marc C. Levy

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Attorney for Defendant Amazon.com, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2009, a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** was sent electronically filed with the Clerk of the Court using the ECF/CM electronic filing system, which will send an electronic copy of this filing to the following counsel of record:

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s/Lori E. True _____