

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

WAKA, LLC, )  
 )  
 A Virginia Limited Liability Company, )  
 )  
 Plaintiff )  
 )  
 v. )  
 )  
 DC KICKBALL, )  
 )  
 A Washington, D.C. Non-stock Corporation )  
 1843 Biltmore St., N.W., Apt. B )  
 Washington, D.C. 20009-1903 )  
 )  
 and )  
 )  
 CARTER RABASA, Individually )  
 )  
 1843 Biltmore St., N.W., Apt. B )  
 Washington, D.C. 20009-1903 )  
 )  
 Defendants )  
 )  
 \_\_\_\_\_ )

Civil Action No. 1:06cv00984 EGS

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO ANSWER, RESPOND OR OTHERWISE  
PLEAD TO COMPLAINT**

Defendants DC Kickball and Carter Rabasa (collectively referred to as "Defendants") hereby move to extend the time to respond to the Complaint in this action. Plaintiff WAKA, LLC ("Plaintiff") does not oppose this Motion. In support of the Motion, Defendants would show as follows:

1. Plaintiff filed suit against Defendants on February 15, 2006.

2. On May 30, 2006, the Clerk of this Court received the above-entitled action on transfer from the United States District Court for the Eastern District of Virginia (Alexandria).

3. Plaintiff agrees to an extension of time for Defendants to answer, respond, or otherwise plead to Plaintiff's Complaint until and including June 30, 2006.

4. Defendants respectfully request that the Court extend time for Plaintiffs to answer, respond, or otherwise plead until and including June 30, 2006.

A proposed order is being filed concurrently with this Motion.

**DATED:** June 13, 2006

**NOVAK DRUCE & QUIGG LLP**



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By: Melvin A. Todd (DC Bar No. 481782)  
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Fifty Third Floor  
Houston, Texas 77002  
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Attorney for Defendants

**CERTIFICATE OF CONFERENCE**

Pursuant to LCvR 7(m), counsel for Defendants have conferred with opposing counsel and this Motion is unopposed.

**DATED:** June 13, 2006

**NOVAK DRUCE & QUIGG LLP**

A handwritten signature in black ink, appearing to be "N. Druce", is written over a horizontal line.

**CERTIFICATE OF SERVICE**

This certifies that a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER, RESPOND OR OTHERWISE PLEAD TO COMPLAINT** was served on Plaintiff's counsel via First Class Mail and Facsimile Transmission on June 13, 2006 as follows:

Thomas M. Dunlap, Esq.  
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Facsimile: 703-777-3656

  
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Of Novak Druce & Quigg LLP