

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

WAKA, LLC,)	
)	
A Virginia Limited Liability Company,)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 1:06cv00984 EGS
)	
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)	
)	
)	

**DEFENDANTS’ UNOPPOSED MOTION FOR FURTHER 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 further 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. Counsel for Plaintiff has been on active military duty for the last two weeks.

4. Counsel for Plaintiff has not yet been admitted to practice in this District, and expects to be admitted on July 11, 2006. Accordingly, Plaintiff has not yet submitted, pursuant to the Court's Initial Electronic Case Filing Order of May 31, 2006, paper and electronic copies of its Complaint.

5. Plaintiff agrees to an extension of time for Defendants to answer, respond, or otherwise plead to Plaintiff's Complaint until and including July 21, 2006.

6. This Motion is made to allow sufficient time for copies of the Complaint to be submitted and counsel for Plaintiff to be admitted prior to filing Defendants' answer or other response, and not for the purpose of unduly delaying this action.

7. Defendants therefore respectfully request that the Court extend time for Plaintiffs to answer, respond, or otherwise plead until and including July 21, 2006.

A proposed order is being filed concurrently with this Motion.

DATED: June 30, 2006

NOVAK DRUCE & QUIGG LLP



By: Melvin A. Todd (DC Bar No. 481782)
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Attorney for Defendants

CERTIFICATE OF CONFERENCE

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

DATED: June 30, 2006

NOVAK DRUCE & QUIGG LLP



CERTIFICATE OF SERVICE

This certifies that a true and correct copy of the foregoing **UNOPPOSED MOTION FOR FURTHER 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 30, 2006 as follows:

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