Tilton et al v. Francis et al Doc. 14

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

JULIE TILTON. **NICOLE BREITFELLER**, and TABITHA GAUTREAUX.

Plaintiffs,

CASE NO. 8:07-cv-00432-JSM-MAP

v.

JOSEPH R. FRANCIS, MRA HOLDINGS, L.L.C., MANTRA FILMS, INC. d/b/a Girls Gone Wild, AMX PRODUCTIONS, L.L.C. d/b/a AMX Video a/k/a GM Video a/k/a George Martin Video a/k/a Action Matrix, a/k/a Aztec Media Co., and **SVOTHI, INC.** d/b/a PPVNetworks a/k/a Nakedontv.com

Defendants.	

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE AND SERVE MOTION TO STRIKE AFFIRMATIVE DEFENSES OF SVOTHI, INC.

Julie Tilton, Nicole Breitfeller, and Tabitha Gautreaux (collectively the "Plaintiffs") hereby move the Court for an extension of time through July 2, 2007, in which to file and serve their Motion to Strike the Affirmative Defenses of Syothi, Inc. ("**Defendant**"). As grounds for this Motion, Plaintiffs state as follows:

- 1. On March 9, 2007, Plaintiffs filed their Complaint. [Dkt. #1].
- 2. On May 29, 2007, Defendant filed and served its Answer, Defenses, and Cross-Claim. [Dkt. # 11].
- 3. Pursuant to applicable rules, Plaintiffs have until June 18, 2007 in which to file and serve a Motion to Strike the Affirmative Defenses asserted by Defendant.

- 4. On June 11, 2007, Plaintiffs' counsel conferred with Defendant's counsel, and Defendant's counsel agreed to an extension of time through July 2, 2007 for the Plaintiffs to file and serve a Motion to Strike the Affirmative Defenses asserted by Defendant.
- 5. This Motion is made in good faith and no party to this lawsuit will be prejudiced if this Motion is granted.

WHEREFORE, Plaintiffs respectfully request the Court to enter an Order allowing Plaintiffs an extension of time through <u>July 2, 2007</u>, in which to file and serve their Motion to Strike the Affirmative Defenses asserted by Svothi, Inc.

Respectfully submitted,

/s/ Mark S. Howard

Mark S. Howard

Florida Bar No. 774146

mhoward@solomonlaw.com

Thomas E. DeBerg

Florida Bar No. 521515

tdeberg@solomonlaw.com

THE SOLOMON TROPP LAW GROUP, P.A.

1881 West Kennedy Boulevard Tampa, Florida 33606-1606

(813) 225-1818 (Tel)

(813) 225-1050 (Fax)

Attorneys for Julie Tilton, et al.

62831.33002.276102 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 11, 2007, a true and correct copy of the foregoing has been furnished via email and/or U.S. Mail to:

Gary S. Edinger GSEdinger@aol.com Law Office of Gary Edinger, P.A. 305 NE 1st Street Gainesville, FL 32601

Attorneys for Svothi, Inc.

Laureen E. Galeoto galeotol@GTlaw.com Karusha Y. Sharpe sharpek@gtlaw.com Barry Scott Richard richardb@GTlaw.com Greenberg Traurig P.A. 101 E. College Ave. Tallahassee, FL 32302

Attorneys for Mantra Films, Inc. and Joseph R. Frances

AMX Productions, LLC c/o Michael Chaussee, Registered Agent 1837 S. Nevada Ave., Box 261 Colorado Springs, CO 80906

David Weinstein weinsteind@GTlaw.com Greenberg Traurig, P.A. 625 E. Twiggs Street Suite 100 Tampa, FL 33602

Filed 06/11/2007

Attorneys for Mantra Films, Inc. and Joseph R. Francis

Richard S. Shankman, Esquire shankmantancredo@aol.com Litigation Concepts, LLC 2536 NW 53rd St. Boca Raton, FL 33496-2204

Attorneys for **Plaintiffs**

MRA Holdings, LLC.

c/o CT Corporation Systems Registered Agent 7666 E. 61st St. Suite 240 Tulsa, OK 74133

/s/ Mark S. Howard

Mark S. Howard Florida Bar No. 774146 mhoward@solomonlaw.com Thomas E. DeBerg Florida Bar No. 521515 tdeberg@solomonlaw.com

THE SOLOMON TROPP LAW GROUP, P.A. 1881 West Kennedy Boulevard Tampa, Florida 33606-1606 (813) 225-1818 (Tel)

(813) 225-1050 (Fax)

Attorneys for Julie Tilton, et al.