

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

HEATHER MARIE KOTIS
and RACHEL CHRISTINE MILL,
individually,

Plaintiffs,

CASE NO. 8:07-cv-00447-T30-EA

v.

DESLIN HOTELS, INC.;
IRENE L. DEVLIN;
DENNIS B., DEVLIN;
GOLDRUSH DISC JOCKEYS, INC.;
DAVID L. BARTON;
BV & BK PRODUCTIONS, LLLP;
CHAD W. CIANI;
MRA HOLDINGS, LLC;
AMX PRODUCTIONS, LLC 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.;
MANTRA FILMS, INC., d/b/a Girls Gone Wild;
JOSEPH R. FRANCIS;
SVOTHI, INC., d/b/a PPVNetworks and nakedontv.com; and
JUCCO HOLDINGS, INC., d/b/a drunkspringbreak.com;

Defendants

**DEFENDANTS, BV & BK PRODUCTIONS, LLLP'S AND CHAD CIANI'S,
UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO
PLAINTIFFS' COMPLAINT**

Defendants, BV & BK PRODUCTIONS, LLLP and CHAD CIANI, by and through their undersigned attorneys, hereby move this Court for an enlargement of time to file their responses to Plaintiffs' Complaint until June 1, 2007. In support of this motion, defendants state as follows:

1. Absent an enlargement of time, Defendant CIANI is required to respond to the Complaint by May 22, 2007.

2. Absent an enlargement of time, Defendant BV & BK is required to respond to the Complaint by May 28, 2007.
3. The Complaint is extensive, with numerous defendants and several causes of action.
4. Due to other demands on counsel's time, an extension of time is necessary to prepare and serve these responses.

LOCAL RULE 3.01(G) CERTIFICATE

Counsel for defendants certifies that prior to filing this motion, she has conferred with counsel for plaintiffs in a good faith effort to resolve the issues raised by this motion and plaintiffs' counsel does not oppose such enlargement of time to serve responses to the Complaint.

WHEREFORE, defendants, BV & BK PRODUCTIONS, LLLP and CHAD CIANI, respectfully request this Court enter an order extending the deadline to serve their responses to the Complaint until June 1, 2007.

Respectfully submitted,

/s/ Camille Godwin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **May 21, 2007**, the foregoing was served upon the following by email:

<p>Stanford R. Solomon Mark Stephen Howard Thomas E. DeBerg The Solomon Tropp Law Group, P.A. 1881 W. Kennedy Blvd. Tampa, FL 33606-1606 tdeberg@solomonlaw.com mhoward@solomonlaw.com ssolomon@solomonlaw.com P: 813-225-1818 F: 813-225-1050 Counsel for Kotis and Mill</p>	<p>Richard S. Shankman Litigation Concepts, L.C. 2536 NW 53rd Street Boca Raton, FL 33496-2204 shankmantancredo@aol.com P: 561-997-2771 F: Unknown Co-Counsel for Kotis and Mill</p>
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/s/ Camille Godwin
Camille Godwin