

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 07-22670 CIV-SEITZ/MCALILEY

STOCKWIRE RESEARCH GROUP, INC.
a Florida corporation, and
ADRIAN JAMES, a Texas Resident.

Plaintiffs,

vs.

JONATHAN LEBED, a Florida resident,
LEBED BIZ, L.L.C., a New Jersey Limited
Liability Company, PIGASA, INC., a New
Jersey Corporation, and CONSTANCE LEBED,
a New Jersey Resident.

Defendants.

**PLAINTIFFS' RESPONSE TO MOTION OF DEFENDANT CONSTANCE LEBED FOR
LEAVE TO SUBMIT RESPONSE TO AMENDED COMPLAINT
AND NOTICE OF WITHDRAWAL OF HER MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Plaintiffs Stockwire Research Group, Inc. and Adrian James, by and through their undersigned counsel hereby file this response to Motion of Defendant Constance Lebed for Leave to Submit Response to Amended Complaint and Notice of Withdrawl of Her Motion to Dismiss for Lack of Personal Jurisdiction. Defendant Constance Lebed's Motion indicates filing a response pursuant to Rule 12, Fed. R. Civ. P. Plaintiff's agreement to Defendant Constance Lebed filing an "alternative response" must be taken in context with the prior communications of counsel for the parties, which always indicated that upon withdrawal of the defense of personal jurisdiction, Defendant's next filing would be an answer. **Plaintiffs are agreeable to an extension to April 7, 2008, if and only if Defendant Constance Lebed's "alternative**

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response” is an answer and not a successive motion to dismiss, which would only seek to further delay this matter which involves and on-going and continuing infringement.

Dated: March 27, 2008

Respectfully submitted,

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Adrian James*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the methods referenced below this day March 27, 2008 on all counsel or parties of record on the service list indicated below:

SERVICE LIST

Stockwire Research Group, Inc. v. Lebed, et. al.
CASE NO.: 07-22670 CIV-SEITZ/MCALILEY
United States District Court, Southern District of Florida

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