

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Cause No. 10-20718-CV-COOKE-BANDSTRA

ALBERT SEGAL and  
MARIANNA CHAPAROVA,

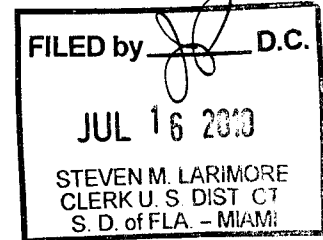
*Plaintiffs,*

vs.

AMAZON.COM, INC.,

*Defendant.*

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**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME AND  
OPPOSED MOTION TO EXCEED PAGE LIMIT IN RESPONDING TO  
DEFENDANT AMAZON.COM, INC.'S "MOTION TO DISMISS FOR IMPROPER  
VENUE OR, ALTERNATIVELY, MOTION TO CHANGE VENUE OR,  
ALTERNATIVELY, MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM"**

*Pro se* Plaintiffs, Albert Segal and Marianna Chaparova (hereinafter "Plaintiffs"), move to submit the following unopposed Motion for Extension of Time and opposed Motion to Exceed Page Limit, seeking permission from this Court to file and serve their Memorandum of Law in Opposition to Defendant Amazon.com, Inc.'s "Motion to Dismiss for Improper Venue or, Alternatively, Motion to Change Venue or, Alternatively, Motion to Dismiss for Failure to State a Claim," pursuant to Local Rule of Civil Procedure 7.1, and so aver:

1. On June 21, 2010, Plaintiffs filed their Amended Complaint in this Court [D.E. 22]
2. On July 6, 2010, Defendant's counsels filed, on behalf of Defendant Amazon.com, Inc. (hereinafter "Amazon"), their respective "Motion to Dismiss for Improper Venue or, Alternatively, Motion to Change Venue or, Alternatively, Motion to Dismiss for Failure to State a Claim" [D.E.26] (hereinafter "Motion").

3. Currently, Plaintiffs' response is due to this Court on Friday, July 23, 2010.
4. Instantly, the Plaintiffs are asking this Court to allow them to file their response to Amazon's Motion no later than Monday, August 2, 2010.
5. Plaintiffs are not attorneys and require a short extension of time to properly prepare a response to Amazon's Motion.
6. Amazon's counsel, Mr. David B. Esau, has indicated that Amazon does not oppose the Plaintiffs' request for extension of time, but that it does oppose Plaintiffs' request to exceed page limit.
7. Amazon has moved for transfer of venue and/or dismissal on multiple alternative grounds on the seven (7) causes of action asserted by Plaintiffs.
8. In order to adequately address each issue raised in Amazon's Motion, Plaintiffs will be required to exceed the twenty (20) page limit set forth in Local Rule 7.1(c)(2).
9. Plaintiffs' estimate of the length of their Memorandum of Law in Opposition to Amazon's Motion is not expected to exceed thirty (30) pages.
10. This request is reasonable under the circumstances, is not sought for the purpose of delay, and will not prejudice any party.

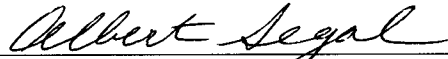
WHEREFORE, for all of the foregoing reasons, the Plaintiffs respectfully request that this Honorable Court grant their instant Motion for Extension of Time and Motion to Exceed Twenty (20) Page Limit imposed by the Civil Rules.

**LOCAL RULE 7.1(A)(3) CERTIFICATION**

Pursuant to Local Rule 7.1 (A)(3), Plaintiffs certify that they have conferred with Amazon's counsel of record in a good faith effort to resolve the issues raised in this motion, and that Amazon's counsel has indicated that, while Amazon does not oppose Plaintiffs' request for extension of time, it opposes Plaintiffs' request to exceed page limit.

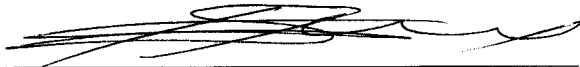
This 14th day of July, 2010.

Respectfully submitted,



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ALBERT SEGAL, Plaintiff, *pro se*  
10490 S.W. 12th Terr., #202  
Miami, FL 33174  
(908) 510-3584  
E-mail: alby1969\_98@yahoo.com



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MARIANNA CHAPAROVA, Plaintiff, *pro se*  
10490 S.W. 12th Terr., #202  
Miami, FL 33174  
E-mail: manach101@yahoo.com

**CERTIFICATE OF SERVICE**

This is to certify that Plaintiffs, Albert Segal and Marianna Chaparova, have this day served upon Amazon's counsels of record the foregoing MOTION FOR EXTENSION OF TIME AND MOTION TO EXCEED PAGE LIMIT, via the electronic mail and/or standard U.S. mail.

This 14th day of July, 2010.

Respectfully submitted,

  
ALBERT SEGAL, Plaintiff, *pro se*

  
MARIANNA CHAPAROVA, Plaintiff, *pro se*

**MAILING LIST**

Carlton Fields, P.A.  
City Place Tower, Suite 1200  
525 Okeechobee Blvd.  
West Palm Beach, Florida 33401

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\_\_\_\_\_ /

**ORDER GRANTING PLAINTIFFS' MOTION FOR EXTENSION OF TIME AND  
MOTION TO EXCEED PAGE LIMIT FOR THEIR MEMORANDUM OF LAW IN  
OPPOSITION TO DEFENDANT AMAZON.COM, INC.'S MOTION TO DISMISS  
OR, ALTERNATIVELY, MOTION TO TRANSFER VENUE**

THIS CAUSE is before the Court upon Plaintiffs' Motion for Extension of Time and Motion to Exceed Page Limit for their Memorandum of Law in Opposition to Defendant Amazon.com, Inc.'s Motion [D.E. 26].

The Court having carefully considered the Motion and being fully advised in the premises, hereby **ORDERS** and **ADJUDGES** as follows:

Plaintiffs' Motion for Extension of Time is **GRANTED**. Plaintiffs shall file their response to Amazon's Motion on or before August 2, 2010.

Plaintiffs' Motion to Exceed Page Limit is **GRANTED**. Plaintiffs' response to Amazon's Motion shall not exceed thirty (30) pages.

**DONE AND ORDERED** in Chambers at Miami, Dade County, Florida this \_\_\_\_\_ day of July, 2010.

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TED E. BANDSTRA  
UNITED STATES MAGISTRATE JUDGE

Copies furnished to:  
*Pro se Plaintiffs and Counsel of Record*