

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

DISNEY ENTERPRISES, INC.,
TWENTIETH CENTURY FOX FILM CORPORATION,
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
COLUMBIA PICTURES INDUSTRIES, INC., and
WARNER BROS. ENTERTAINMENT INC.,

Plaintiffs,

v.

HOTFILE CORP., ANTON TITOV, and
DOES 1-10.

Defendants.

**JOINT MOTION AND MEMORANDUM OF LAW OF PLAINTIFFS, DEFENDANTS,
AND NON-PARTY LEMURIA COMMUNICATIONS, INC. FOR EXTENSION OF
TIME TO FILE RESPONSES AND REPLIES TO PENDING MOTIONS TO COMPEL
(Dkt. Nos. 108, 110, 111)**

Plaintiffs Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, Universal City Studio Productions LLLP, Columbia Pictures Industries, Inc., and Warner Bros. Entertainment Inc. (collectively “Plaintiffs”); Defendants Hotfile Corp. and Anton Titov (collectively “Defendants”) (Plaintiffs and Defendants are collectively the “Parties”); and non-party Lemuria Communications, Inc. (“Lemuria”), move pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure for an extension of time for each Party and Lemuria to serve pleadings or other papers in response and reply to Plaintiffs’ Motion to Compel Responses to Requests for Production of Documents and Interrogatories (Dkt. No. 110) (“Plaintiffs’ Motion to Compel”) and Plaintiffs’ Motion to Compel Responses to Subpoena to Third Party Lemuria Communications, Inc. (“Lemuria”) (Dkt. No. 108) (“Motion to Compel Against Lemuria”) and Defendants’ Motion to Compel Responses to Discovery from Plaintiffs (Dkt. No. 111) (“Defendants’ Motion to Compel”). All of these motions were filed on August 3, 2011. The Parties and Lemuria move for an entry of Order that sets August 26, 2011 as the response

deadline for the motions and September 9, 2011 as the deadline for reply briefs. The grounds for this Joint Motion are set forth below in the accompanying memorandum of law.

MEMORANDUM OF LAW

Under present deadlines, papers in opposition to the pending motions to compel are due on August 22, and reply papers in support of these motions are due seven days after opposition memoranda are filed. The Parties and Lemuria respectfully request that the Court extend the deadlines to file such oppositions and replies in response to the above-listed motions to the time indicated above.

This Joint Motion is not filed for purposes of delay or for any improper purpose but to provide additional time needed by counsel to prepare their respective pleadings. Neither Party, nor Lemuria, will be prejudiced by the Court granting this Joint Motion for Extension of Time. The Court has authority pursuant to Rule 6 of the Federal Rules of Civil Procedure to grant extensions of time. *See* Fed. R. Civ. P. 6(b)(1).

CONCLUSION

On the basis of the foregoing, the Parties and Lemuria respectfully request that both Parties, as well as third-party Lemuria, be given additional time to file their pleadings or other papers in response and reply to the pending motions to compel (Dkt. Nos. 108, 110, 111) as set forth herein.

CERTIFICATE OF GOOD FAITH CONFERENCE

I HEREBY CERTIFY that counsel for Plaintiffs, Defendants, and third party Lemuria Communications, Inc. have met and conferred regarding the relief requested in this Joint Motion, and Karen L. Stetson, Plaintiffs' counsel who makes this joint filing on behalf of all Parties, also has authorization from counsel for Defendants and Lemuria Communications, Inc. to file the Joint Motion on behalf of Defendants and Lemuria Communications, Inc.

By: /s/ Karen L. Stetson
Karen L. Stetson

Dated: August 17, 2011

Respectfully submitted,

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Respectfully submitted,

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*Counsel for Defendants and Lemuria
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th Day of August, 2011, I served the following document via overnight delivery to Andrew Leibnitz, counsel for Lemuria Communications, Inc. at his listed address on the attached service list.

In addition, I served the following document on all counsel of record on the attached service list via the Court's CM/ECF filing system:

Joint Motion of Plaintiffs, Defendants, and Non-Party Lemuria Communications, Inc. for Extension of Time to File Responses and Replies to Pending Motions to Compel (Dkt. Nos. 108, 110, 111)

I further certify that I am admitted to the United States Court for the Southern District of Florida and certify that this certificate of Service was executed on this date.

By: /s/ Karen L. Stetson
Karen L. Stetson

SERVICE LIST

**Disney Enterprises, Inc., et al. v. Hotfile Corp. et al.
CASE NO. 11-CIV-20427-JORDAN**

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