

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

MEANITH HUON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 11-cv-03054
	)	
BREAKING MEDIA, LLC <i>et al.</i> ,	)	District Judge John J. Tharp, Jr.
	)	
Defendants.	)	Magistrate Judge Jeffrey T. Gilbert

**ATL DEFENDANTS’ MOTION FOR LEAVE  
TO FILE BRIEF IN EXCESS OF FIFTEEN PAGES**

Defendants Breaking Media, Inc. (formerly known as Breaking Media, LLC), David Lat, Elie Mystal, John Lerner, and David Minkin (the “ATL Defendants”), pursuant to Local Rule 7.1, respectfully request that the Court grant them leave to file their memorandum in support of their motion to dismiss (“Memorandum”), which exceeds the 15-page limit established by the Local Rule. In support of their motion, ATL Defendants state as follows:

1. Plaintiff’s Fourth Amended Complaint spans sixty-eight pages, contains 273 numbered allegations, including at least fifty-five alleged actionable statements, nine counts, and twenty-one exhibits.

2. In connection with their Motion to Dismiss, the ATL Defendants endeavored to use the minimum number of pages necessary to present their various arguments concerning Plaintiff’s numerous factual and legal contentions. Their Memorandum in Support of the Motion to Dismiss is eighteen pages long. In addition, to conserve judicial resources and address each statement adequately, the ATL Defendants have attached a summary chart to the Memorandum. The chart identifies which of the arguments in the Memorandum apply to each of the alleged

fifty-five statements and, accordingly, avoids unnecessary repetition in the Memorandum itself.  
The chart is eleven pages long.

3. The Memorandum is attached hereto as Exhibit 1. The Memorandum includes a table of contents and table of cases, as required by Local Rule 7.1.

WHEREFORE, the ATL Defendants respectfully request that this Court permit them to file the Memorandum, and grant such further relief as is just.

Dated: January 7, 2013

Respectfully submitted,

BREAKING MEDIA, INC. f/k/a BREAKING  
MEDIA, LLC, DAVID LAT, ELIE MYSTAL,  
JOHN LERNER, AND DAVID MINKIN

By: /s/ Steven P. Mandell  
One of their attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing **ATL DEFENDANTS' MOTION FOR LEAVE TO FILE BRIEF IN EXCESS OF FIFTEEN PAGES** has been served on January 7, 2012 via the Court's CM/ECF system on all counsel of record who have consented to electronic service.

Any other counsel of record will be served by electronic mail and regular mail.

/s/ Steven P. Mandell