

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

MEANITH HUON,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 11-cv-03054
BREAKING MEDIA, LLC a/k/a)	
BREAKING MEDIA; BREAKING MEDIA, INC.)	District Judge John J. Tharp, Jr.
a/k/a BREAKING MEDIA; DAVID LAT; ELIE)	
MYSTAL; JOHN LERNER; and DAVID MINKIN;)	Magistrate Judge Jeffrey T. Gilbert
(“ATL DEFENDANTS”);)	
)	
GAWKER MEDIA, LLC a/k/a GAWKER MEDIA;)	
BLOGWIRE HUNGARY SZELLEMI ALKOTAST)	
HASZNOSITO KFT; GAWKER MEDIA GROUP,)	
INC. a/k/a GAWKER MEDIA; GAWKER)	
ENTERTAINMENT, LLC; GAWKER)	
TECHNOLOGY, LLC; GAWKER SALES, LLC,)	
NICK DENTON; IRIN CARMON; and)	
GABY DARBYSHIRE (“JEZEBEL)	
DEFENDANTS”),)	
)	
Defendants.)	

**ATL DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
THEIR REPLY IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFF’S
FOURTH AMENDED COMPLAINT**

Defendants Breaking Media, Inc. (formerly known as Breaking Media, LLC), David Lat, Elie Mystal, John Lerner, and David Minkin (the “ATL Defendants”) respectfully request that the Court extend by two days the deadline to file a reply in support of their motion to dismiss the Fourth Amended Complaint of Plaintiff Meanith Huon (“Plaintiff”).

1. On November 15, 2012, Plaintiff filed his Fourth Amended Complaint. (Dkt. No. 162.)

2. On January 7, 2013, the ATL Defendants filed their motion to dismiss the Fourth Amended Complaint. (Dkt. Nos. 178-181.)

3. On January 10, 2013, this Court entered a briefing schedule; Plaintiff's response to the motion to dismiss would be due March 12, 2013, and the ATL Defendants' reply would be due April 9, 2013. (Dkt. No. 187.) On March 12, 2013, Plaintiff filed his response. (Dkt. Nos. 193-94.)

4. Due to the press of other litigation (including two reply briefs due in a different case on the same day as the reply brief in this matter), the ATL Defendants request two additional days, until April 11, 2013, to file their reply brief.

5. No party will suffer prejudice as a result of the proposed extension. This is the ATL Defendants' first request for an extension of the reply brief deadline.

6. Counsel for the ATL Defendants has conferred with counsel for both Plaintiff and the Jezebel Defendants about this request for an extension, and they do not oppose a two-day extension.

WHEREFORE, the ATL Defendants respectfully request that this Court enter an order extending the deadline to file a reply in support of their motion to dismiss to April 11, 2013, and for such further relief as the Court deems appropriate.

Dated: April 9, 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' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE THEIR REPLY IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFF'S FOURTH AMENDED COMPLAINT** has been served on April 9, 2013 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