#### IIN THE UNITED STATES DISTRICT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MEANITH HUON,	Plaintiff,	)
<b>V.</b>		) CIVIL ACTION NO.: 1: 11-cv-3054
ABOVETHELAW.COM, et. al.		) ) )
	Defendants	, ) )

#### MOTION TO MODIFY BRIEFING SCHEDULE AN FOR EXTENSION OF TIME AND TO FILE A RESPONSE BRIEF IN EXCESS OF 15 PAGES

Plaintiff, Meanith Huon, states as follows:

1. Defendants, Breaking Media, LLC, Breaking Media, Breakingmedia.com, David

Lat, John Lerner, Abovethelaw.com, Elie Mystal, ("The Above the Law"

Defendants") filed a Motion to Dismiss and a 22-page Memorandum of Law with

Exhibits in Excess of 170 pages.

- 2. Defendants' Responsive Pleading was originally due on or about August 4, 2011, after Defendants were given 60 days to respond to the Complaint.
- 3. Defendants moved, without opposition from Plaintiff, for an extension of time to August 22, 2011, and then to September 21, 2011, to respond.
- 4. Defendants have had more than 3 months to prepare their Motion to Dismiss and Memorandum of Law, which contains a table of contents.
- Plaintiff anticipates that he will need additional time to respond to The AboveTheLaw.Com Defendants' lengthy Memorandum and that he will need more

than 15 pages to respond.

- The responsive pleadings of the Defendants, Defendants Irin Carmon, Gabby Darbyshire, Nick Denton, Gawker Media, Jezebel.com (the "Jezebel.com Defendants") are not yet due.
- The AboveTheLaw Defendants will not be prejudiced by granting Plaintiff more time to respond.
- 8. Plaintiff, Meanith Huon, is representing himself *pro se*. Mr. Huon has other professional obligations in state and federal court. He is assistant general counsel to Aidan Monahan and Monahan Properties, LLC; he is assistant general counsel to Flava Works, Inc.. Mr. Huon maintains his own law practice. Mr. Huon started a full time attorney position with a law firm on September 26, 2011.
- 9. Mr. Huon also filed a motion for the Defendants to produce the complete trial transcript attached as Exhibit B to their Memorandum. The Court referred this matter to Magistrate Judge Gilbert for ruling. The parties need time for Judge Gilbert to rule on this matter before Plaintiff files his Response brief.
- 10. The next Court status date is December 22, 2011.

WHEREFORE, Plaintiff, Meanith Huon, requests that this Honorable Court:

- Modify the briefing schedule to give Plaintiff 35 days, or until October 31, 2011, to file a response brief and to give The AboveTheLaw Defendants until November 7, 2011 to reply.
- 2. Grant Plaintiff leave to file a Response brief in excess of 15 pages.

Respectfully Submitted,

By: /s/ Meanith Huon /s/ Meanith Huon

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## IN THE UNITED STATES DISTRICT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MEANITH HUON, v.	Plaintiff,	)))))))))))))))))))))))))))))))))))))))
FORMER MADISON COUN ATTORNEY WILLIAM MU		)))))

CIVIL ACTION NO. 11-3050 JURY TRIAL DEMANDED

## **CERTIFICATE OF SERVICE**

Under penalties of law, I attest the following documents or items have been or are being electronically served on all counsel of record for all parties:

# MOTION TO MODIFY BRIEFING SCHEDULE AN FOR EXTENSION OF TIME AND TO FILE A RESPONSE BRIEF IN EXCESS OF 15 PAGES

Respectfully submitted, /<u>s/ Meanith Huon</u> Meanith Huon PO Box 441 Chicago, Illinois 60690 Phone: (312) 405-2789 E-mail: huon.meanith@gmail.com IL ARDC. No.: 6230996