

exhibits.

4. Mr. Huon has offered a very good reason for an extension of time for 8 additional business days. He was given until November 30, 2011 to respond to an 82 page memorandum with exhibits and a 192 page motion with exhibit. These memorandum contained a table of contents and citations to numerous case law—essentially like an appellate brief. Defendants also attached a chart with columns and rows of abbreviations and defamatory statements in lieu of writing a cogent argument. Mr. Huon endeavored to stay within the page limitation but went over. In lieu of asking for more time to reduce his brief, he asked to file the 33 page response to the Above the Law Defendants' Memorandum and 8 additional business days to respond to the Jezebel Defendants' Memorandum. The Above the Law Defendants' Exhibit B was ordered removed by the Court and ordered to be re-filed. The Defendants did not immediately re-filed and left the impression Defendants were abandoning the exhibit. The Above the Law Defendants re-filed Exhibit B (173 pages) 7 days before Mr. Huon's response brief was due.
5. Mr. Huon is not asking that the Jezebel Defendants reply during the week of Christmas or New Year's. He has no objections to the amount of time the Jezebel Defendants need to reply.
6. The Jezebel Defendants attempt to create a false impression with their arguments. Mr. Huon's Second Amended Complaint was initiated by Mr. Huon, after he voluntarily dismissed certain defendants. Mr. Huon's First Amended Complaint was initiated by Mr. Huon by adding the Jezebel Defendants. The original complaint was filed to avoid missing the statute of limitations as to the Above the Law Defendants.

7. The Jezebel Defendants do not identify the half a dozen motions. Is it the motion to redact the trial transcript to protect the privacy of third parties? Is it the motion to bring to the Court's attention that the transcript was not removed by the Clerk after the order was entered? Is it the motion to correct typographical errors? The only party filing memorandums and motions without merit are the Jezebel Defendants, who seem to believe that by opposing every request for an extension will bring Defendants closer to winning the case.
8. What does the prayer for damages have to do with a Rule 12(b)(6) Motion? This is not a summary judgment motion. This is not a motion for judgment on the pleadings. The parties have not had a 26(f) conference. The defamatory post remains on the Internet prejudicing Mr. Huon each day it remains there. How does preventing someone 8 additional business days to respond to the merits of a motion result in a quick resolution—as opposed to an unfair resolution. It would only lead to an appeal and result in piecemeal litigation.
9. The Jezebel Defendants continually refer to the prayer of damages as a basis for treating this litigation any different than another. It should not be. The parties are at the pleading stage. If the Jezebel Defendants do not want to be sued for defaming someone, the Defendants should not be cyberbullying and defaming individuals online. If the Defendants had adopted and followed a code of ethics for journalists and reporters, Defendants would not have been sued. Mr. Huon did not name Forbes.com as a defendant.
10. Mr. Huon asked for 8 additional business days or by December 12, 2011. Mr. Huon was acquitted on May 6, 2010, after facing potentially 20+ years in prison for

false and meritless charges. After almost 2 years of waiting to get his life back, Mr. Huon is acquitted, only to find himself falsely being accused a serial rapist with the headline from the Jezebel.com blog “Acquitted Rapist”. Googling Mr. Huon results in the Jezebel.com story as one of the top results. After being acquitted, with very little time to get his life back and his cash flow going, Mr. Huon finds himself defending false charges against the Jezebel.com Defendants to clear his name again. He had hardly began getting life back, before finding himself a target of cyberbullying and defamation on the world wide web.

11. This is not a screenplay or a proposal for a film or pilot on “L.A. Law.” This is real life where cyberbullying and defaming someone has real consequences.
12. Mr. Huon asks for 8 additional business days, or until December 12, 2011, to respond on the merits.

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

1. Grant Plaintiff leave to file a Response brief in excess of 15 pages to the Above The Law Defendants’ Motion to Dismiss.
2. Grant him a short extension of time to December 12, 2011 to file his Response Brief to the Jezebel Defendants’ Motion to Dismiss.

Respectfully Submitted,

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

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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 on December 2, 2011:

**REPLY BRIEF IN SUPPORT OF AMENDED MOTION TO FILE A RESPONSE BRIEF
IN EXCESS OF 15 PAGES
TO ABOVE THE LAW'S MOTION TO DISMISS
AND FOR AN EXTENSION OF TIME TO
RESPOND TO JEZEBEL'S MOTION TO DISMISS.**

Respectfully submitted,
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