

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

MEANITH HUON,)	
)	
	Plaintiff,	
v.)	CIVIL ACTION NO.: 1: 11-cv-3054
)	
)	
ABOVETHELAW.COM, et. al.)	
)	
	Defendants	
)	

**PLAINTIFF’S OBJECTION TO THE JEZEBEL DEFENDANTS’
CORRECTEDMOTION FOR EXTENSION OF TIME**

Plaintiff, Meanith Huon, states as follows:

1. The Magistrate Judge gave Mr. Huon until November 30, 2011 to file a 22 page Response Brief to the Above the Law Motion to Dismiss and a 27 page Response Brief to the Jezebel Defendants’ Motion to Dismiss, since the Jezebel Defendants filed a 27 page Memorandum, including 55 pages of exhibits. (Mr. Huon recalls asking the Magistrate Judge to file the same number of pages as the 27 page Jezebel Defendants’ memorandum).

2. On November 30, 2011, Mr. Huon filed a Motion for Leave to File a 33 page Response Brief to the Above The Law Defendants’ Motion to Dismiss and for an extension of time until December 12, 2011 to file his 27-page Response Brief to the Jezebel Defendants’ Motion to Dismiss. The Jezebel Defendants immediately objected. Mr. Huon replied indicating that he had no objection to the Jezebel Defendants getting an extension of time to file a Reply Brief so long as the Court gave him until December 12, 2011 to file his 27 page Response Brief. But the Jezebel Defendants did object leading to the December 5, 2011 Court

Order.

3. On December 5, 2011, the Court entered the following order:

Plaintiff is granted leave to file a responsive brief of no more than 23 pages to the Above The Law Defendants Motion to Dismiss on or before December 12, 2011 2.

As to all Memoranda relating to Above The Law Defendants Motion to Dismiss heretofore filed or scheduled to be filed, all parties shall file on or before December 12, 2011, a summary of no more than 15 pages of their respective Memoranda and a summary of no more than 15 pages of any exhibits to said Memoranda. (For further details, see Order in separate docket entry). The motion hearing set for 12/6/11 is stricken. Judicial staff mailed notice (gl,)

4. Mr. Huon did not file a motion for clarification, after Defendants had accused him of filing half a dozen motions. He tried calling counsel for the Above The Law Defendants directly on at least two days but it went to voice mail.

5. With less than a week to file a 23 page Response Brief and a 27 page Response Brief, Mr. Huon called the Courtroom Deputy and asked for clarification as to what the Court meant by "Summary". Did the Court want Mr. Huon to file a 27 page Response Brief to the Jezebel Motion to Dismiss, a 23 page Response Brief to the Above the Law Defendants' Motion to Dismiss, and two 15-page Summaries? Mr. Huon was advised that Mr. Huon and the Jezebel Defendants were to file their respective Memorandum or Response Briefs by December 12, 2011 not to exceed 15 pages.

6. In the remaining week, Mr. Huon endeavored to convert his 33 page Response Brief to the Above the Law's Motion to Dismiss into a 23 page Response Brief and to convert his 27 page Response Brief to the Jezebel Defendants' Motion to Dismiss into a 15 page Response Brief.

7. Mr. Huon was finally able to review the Jezebel Defendants' Motion to Dismiss and Memorandum containing pages of personal attacks against Mr. Huon that had no bearing on this lawsuit. Defendant accused him of having pending criminal charges and being a sex offender. Mr. Huon has no pending criminal charges and has never been convicted of a felony or misdemeanor. Mr. Huon endeavored to limit his Response to 15 pages, even though Defendants spent pages personally attacking him and raising issues with no connection to this lawsuit.

8. Mr. Huon's Response Brief was not filed at the "eleventh hour" or late. On December 5, 2011, the Court ordered any Memorandum relating to the Motions to Dismiss to be filed by December 5, 2011.

9. At the eleventh hour, as Mr. Huon is trying to convert his Response Briefs into briefs complying with the Court's page limitations, the Jezebel Defendants files yet another motion for Mr. Huon to respond to. The Motion misstated that Mr. Huon has no objection. Counsel for the Jezebel Defendants never called or contacted Mr. Huon.

10. In yet another motion, the Jezebel Defendants now seem to argue that the fact that Mr. Huon was willing to modify the briefing schedule--**in a prior motion that became moot after the Jezebel Defendants opposed his request and after the Court entered the December 5, 2011 order**—translated *carte blanche* into him unopposing any extension of time sought by Defendants in subsequent motions. Why would Mr. Huon agree to an extension of time to Defendants' attorneys who called him a sex offender, after the Defendants' objection led to the Court limiting Mr. Huon's brief from 27 pages to 15 pages?

11. After repeated calls, Mr. Huon asked Jezebel Defendants' local counsel why he contended that Mr. Huon did not oppose his motion. Local counsel for Defendants advised Mr.

Huon that the New York attorneys for the Jezebel Defendants represented that Mr. Huon had no objection. Exhibit “A”. Local counsel provided a different reason in this new motion.

12. It would be patently unfair for the Jezebel Defendants to be given leave to file an 82 page Motion to Dismiss, Memorandum, Exhibits, to be given leave to file a 15 page Summary, to be given more time to file a Reply brief, after the Defendants’ objection to each and every request to extension from Mr. Huon resulted in the Court limiting Mr. Huon’s Response Brief from 27 pages to 15 pages. Defendants created this situation by their repeated unreasonable opposition to Mr. Huon’s request for an extension of time.

13. Mr. Huon had no objections so long as he was afforded the same page limitations and time to respond. However, in this case, Mr. Huon was given 27 pages to respond. But by opposing his most recent extension of time, Mr. Huon’s page limitation was reduced from 27 pages to 15 pages to respond to an 82 page document containing pages of personal attacks on him with little or no connection to this lawsuit. Now Defendants seek more time to file Reply brief and a Summary and more time to call Mr. Huon a sex offender. The parties are briefing a motion to dismiss that Defendants treat as a summary judgment motion when no discovery has been conducted and the case law seem to support Mr. Huon’s position.

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

1. Deny the Jezebel Defendants’ Motion for Extension of time.
2. Alternatively, Mr. Huon asks that the Court modify the entire briefing schedule to allow Mr. Huon more time to file an amended Response Brief and his Summary not to exceed the same number of pages that the Jezebel Defendants have filed or will file—82 pages to date plus 15 pages of the Summary.

Respectfully Submitted,

By: /s/ Meanith Huon
Meanith Huon

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

MEANITH HUON,)	
)	
Plaintiff,)	
v.)	CIVIL ACTION NO. 11-3050
)	
)	JURY TRIAL DEMANDED
)	
FORMER MADISON COUNTY STATE'S)	
ATTORNEY WILLIAM MUDGE, et. al.)	

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 13, 2011:

**PLAINTIFF'S OBJECTION TO THE
THE JEZEBEL.COM DEFENDANTS' CORRECTED
MOTION FOR EXTENSION OF TIME**

Respectfully submitted,
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