

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Gatehouse Media, Inc., and Gatehouse Media)	
Illinois Holdings, Inc.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 10-cv-50165
)	
That's Great News, LLC)	
)	
Defendant.)	

MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL

Plaintiffs GateHouse Media, Inc. and GateHouse Media Illinois Holdings, Inc. (collectively, "GateHouse"), by and through its attorneys, Greenberg Traurig LLP, hereby file this Motion to Extend Time to File Stipulation of Dismissal ("Motion"), and in support thereof states as follows:

1. On June 30, 2010, GateHouse filed its Complaint initiating the instant litigation against Defendant That's Great News, LLC ("Defendant") alleging numerous trademark and copyright violations as well as other tortious and unlawful conduct. (See Dkt. No. 1.)

2. Since the filing of the Complaint, no appearance or responsive pleading has been filed on behalf of Defendant. Although Defendant has not appeared in this matter, the parties have nonetheless been actively engaged in settlement discussions, which have recently culminated in substantially agreed settlement terms and conditions.

3. On August 13, 2010, GateHouse appeared before this Court on status and reported the parties' settlement and further advised that the parties were in the process of negotiating and documenting that settlement agreement. At that time, the Court entered an Order allowing the parties 30 days to complete settlement and file a Stipulation to Dismissal pursuant to Fed. R. Civ.

P. 41. (See Dkt. No. 9) (further stating that “[i]f the parties fail to file the required stipulation to dismiss and this court does not extend the period of time for filing the stipulation to dismiss, the Clerk’s Office is directed to enter an order of dismissal with prejudice and judgment[.]”)

4. Since then, the parties have endeavored to complete the documentation of their agreement, and have now twice exchanged comprehensive drafts of a proposed settlement agreement. Negotiations are proceeding in good faith and the parties expect settlement to be completed within 30 days.

5. Accordingly, GateHouse requests that this Court vacate the current date upon which the parties must file a Stipulation of Dismissal and extend the period to **October 13, 2010**. GateHouse further requests that the Court vacate the portion of its August 13, 2010 Order directing the Clerk to *sua sponte* “enter an order of dismissal with prejudice and judgment” on September 13, 2010 in the event the parties do not file a Stipulation of Dismissal upon that date. (See Dkt. No. 9.)

6. GateHouse further requests, per agreement with Defendant, that Defendant’s date to answer or otherwise respond to the Complaint shall be extended to October 13, 2010 - in the unlikely event a final settlement is not concluded prior to that date.

7. This Motion is made in good faith, and is not interposed for the purposes of delay. The relief requested herein will not prejudice any party to this lawsuit.

WHEREFORE, GateHouse requests that this Court grant the relief requested herein in its entirety and extend the date upon which it must file a Stipulation of Dismissal to October 13, 2010. GateHouse further requests that the Court grant any other and further relief that it deems just and proper.

Dated: September 10, 2010

Respectfully submitted,
GREENBERG TRAURIG, LLP

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Inc. and GateHouse Media Illinois Holdings,
Inc.*

CERTIFICATE OF SERVICE

I, Daniel G. Hildebrand, an attorney, hereby certify that on September 10, 2010, I served the foregoing **Motion to Extend Time to File Stipulation of Dismissal** via the Court's CM/ECF system to all parties of record.

/s/ Daniel G. Hildebrand