

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

SHANA SANDLER,

Plaintiff

v.

MIA CALCAGNI *et al*,

Defendants

Case No. 1:07-cv-00029

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO REPLY
TO BOOKSURGE'S MEMORANDUM OPPOSING
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT,
WITH INCORPORATED MEMORANDUM OF LAW**

Plaintiff Shana Sandler hereby moves for an extension of time within which to reply to the Memorandum Opposing Plaintiff's Motion for Partial Summary Judgment filed by Defendant Booksurge, LLC. Plaintiff's response is currently due on April 14, 2008, and Plaintiff requests a ten-day extension from that date within which to submit its reply.

Plaintiff's counsel has been focused on responding to the Motion for Summary Judgment filed by Defendants Booksurge and Peter Mars, which response is also due on April 14, 2008, and has recently been out of the country on vacation. Therefore, Plaintiff's counsel requires additional time to gather the information necessary to reply to the opposing memorandum.

Defendants' counsel, William Druary and Bruce Mallonee have indicated that they consent to the granting of this Motion. Counsel for Defendant Booksurge has not yet responded to the inquiry from Plaintiff's counsel.

WHEREFORE, Plaintiff moves for a ten-day extension to and including April 24, 2008, to reply to the Memorandum Opposing Plaintiff's Motion for Partial Summary Judgment.

Dated at Bangor, Maine, this 8th day of April, 2008.

PLAINTIFF, Shana Sandler,

BY /s/ Bernard J. Kubetz
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CERTIFICATE OF SERVICE

I, Bernard J. Kubetz, hereby certify that on April 8, 2008, I electronically filed the foregoing Motion for Extension of Time to Reply to the Memorandum Opposing Plaintiff's Motion for Partial Summary Judgment with the Clerk of the United States District Court using the CM/ECF system, which will send notification of such filing to the following:

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