

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE AT BANGOR

|                   |   |                            |
|-------------------|---|----------------------------|
| SHANA SANDLER,    | ) |                            |
|                   | ) |                            |
| Plaintiff         | ) |                            |
|                   | ) |                            |
| v.                | ) | Case No. 1:07-CV-00029-GZS |
|                   | ) |                            |
| MIA CALCAGNI,     | ) |                            |
| RALPH CALCAGNI,   | ) |                            |
| MAUREEN CALCAGNI, | ) |                            |
| PETER MARS,       | ) |                            |
| and               | ) |                            |
| BOOKSURGE, LLC,   | ) |                            |
|                   | ) |                            |
| Defendants.       | ) |                            |
|                   | ) |                            |

**BOOKSURGE, LLC'S MOTION TO EXTEND TIME TO  
REPLY TO PLAINTIFF'S MEMORANDUM IN OPPOSITION TO  
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Defendant BookSurge, LLC ("BookSurge") moves for an extension of time to reply to Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment, filed by Plaintiff Shana Sandler ("Ms. Sandler") on April 14, 2008. Pursuant to Local Rule 7(c), BookSurge's reply is due on April 25, 2008. BookSurge requests a ten-day extension from that date.

BookSurge seeks an extension of time for two reasons. First, counsel for Ms. Sandler previously stipulated to this request when BookSurge stipulated to Ms. Sandler's request for a ten-day extension to file her responsive pleadings. Second, although Ms. Sandler's counsel timely filed Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment and supporting pleadings, Ms. Sandler's counsel did not serve the sealed versions of (1) Plaintiff's Memorandum in Opposition to Defendants'

Motions for Summary Judgment, (2) Plaintiff's Response to Defendant BookSurge's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts, and (3) the Declaration of Shana Sandler in Support of Plaintiff's Memorandum in Opposition to Defendant BookSurge and Defendant Mars' Motions for Summary Judgment, until April 15, 2008. As a result, additional time is needed to compile BookSurge's Reply and Reply Statement of Material Facts.

BookSurge respectfully moves for a ten-day extension to and including May 5, 2008, to reply to Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment.

Respectfully submitted,

BOOKSURGE, LLC

By its attorneys,

/s/ Harold J. Friedman  
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April 18, 2008

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| and               | ) |                            |
| BOOKSURGE, LLC,   | ) |                            |
|                   | ) |                            |
| Defendants.       | ) |                            |
|                   | ) |                            |

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Dennis Tessier  
Dennis Tessier