

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division

COSTAR REALTY INFORMATION,  
INC., et al.

\*

\*

Plaintiffs,

v.

\*

Case No.: 8:06-CV-00655-PJM

ATKINSON HUNT, et al.

\*

Defendants.

\*

\*

\* \* \* \* \*

**MOTION FOR EXTENSION OF TIME TO ANSWER OR RESPOND**

Defendant Atkinson Hunt moves to extend its time to answer or otherwise respond to the Complaint by forty-five (45) days from the date of this Motion, such answer or response to be due on or before August 11, 2006, and in support says as follows:

1. On June 23, 2006, the firm of Gorman and Williams was retained by David Atkinson, principal of Defendant Atkinson Hunt, to represent Defendant Atkinson Hunt in this litigation.
2. Defendant Atkinson Hunt operates and is principally located in New Jersey. Counsel for Atkinson Hunt has not yet had significant opportunity to obtain necessary information about Defendants and learn about the facts of this case, though it is making efforts to do so.
3. While it is customary to request a thirty day extension of time, counsel for Atkinson Hunt requests a forty-five day extension due to a scheduling conflict with a jury trial that is scheduled to begin on July 24, 2006 in this Court (Case No. PJM-02-CV-1556).
4. Prior to filing this Motion, and in accordance with Local Rule 105, Defendant Atkinson Hunt's counsel requested the consent of Plaintiff's counsel to the extension of 45 days' time and explained the circumstances for such request, but Plaintiff's counsel has not consented.
5. Prior to filing this Motion, and in accordance with Local Rule 105, Defendant Atkinson Hunt's

counsel requested the consent of Defendant Resource Realty and Personal Property Evaluations, Inc.'s counsel to the extension of 45 days' time and explained the circumstances for such request, and such consent was granted by Defendant Resource Realty and Personal Property Evaluations, Inc.'s counsel.

6. No Scheduling Order has yet been entered by this Court. Granting this Motion for Extension of Time will not alter or impact the Court's trial calendar and will not prejudice Plaintiff.
7. Upon information and belief, Defendants have valid defenses, both as to procedural matters and as to the merits of this dispute, and thus Defendants' opportunity to present these defenses may be prejudiced in the absence of the extension of time herein requested. There is good cause to grant Defendants the extension requested.
8. Defendants have not answered or otherwise responded and reserve all rights, defenses, and objections available to the Federal Rules of Civil Procedure and applicable law.
9. For these reasons, Defendants request a forty-five (45) day extension of Defendants' time to file its answer or other response to Plaintiff's Complaint such that Defendants' answer or other response shall be due on or before August 11, 2006.

WHEREFORE, Defendants request that the Court grant this Motion for Extension of Time to Answer or Respond and enter the attached form of Order.

\_\_\_\_\_  
/s/  
Michael S. Yang (Bar No. 25951)  
Francis J. Gorman (Bar No. 00690)  
**GORMAN & WILLIAMS**  
Two North Charles Street  
Baltimore, Maryland 21201-3754  
Telephone: (410) 528-0600  
Facsimile: (410) 528-0602

*Attorneys for Defendant Atkinson Hunt*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of June, 2006, a copy of the foregoing Motion For Extension Of Time To Answer Or Respond was filed and served in accordance with the Court's CM/ECF guidelines upon:

Alan Saul Dalinka  
DLA Piper Rudnick Gray Cary US LLP  
203 N. LaSalle St., Ste 1900  
Chicago, Illinois 60601

Hugh J. Marbury  
DLA Piper Rudnick Gray Cary US LLP  
6225 Smith Avenue  
Baltimore, Maryland 21209-3600

Keith William Medansky  
DLA Piper Rudnick Gray Cary US LLP  
203 N. LaSalle St., Ste. 1900  
Chicago, Illinois 60601  
Attorneys for Plaintiffs

Keith R. Truffer  
Royston Mueller McLean and Reid LLP  
102 W. Pennsylvania Ave., Ste. 600  
Towson, Maryland 21204  
Attorney for Defendant Resource Realty of Southern New Jersey

\_\_\_\_\_  
/s/  
Michael S. Yang

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division

COSTAR REALTY INFORMATION,  
INC., et al.

\*

\*

Plaintiffs,

v.

\*

Case No.: 8:06-CV-00655-PJM

ATKINSON HUNT, et al.

\*

Defendants.

\*

\*

\* \* \* \* \*

**ORDER**

Upon consideration of Defendants' Motion for Extension of Time to Answer or Respond, it is this  
\_\_\_\_\_ day of \_\_\_\_\_, 2006:

ORDERED that Defendants' Motion for Extension of Time to Answer or Respond be GRANTED.  
Defendants' answer or other response to the Complaint shall be filed on or before August 11, 2006.

\_\_\_\_\_  
Peter J. Messitte  
United States District Judge