

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DMITRIY SHIROKOV, on behalf of himself
and all others similarly situated,
Plaintiff

v.

DUNLAP, GRUBB & WEAVER, PLLC; US
COPYRIGHT GROUP; THOMAS DUNLAP;
NICHOLAS KURTZ; GUARDALEY,
LIMITED; and ACHTE/NEUNTE Boll Kino
Beteiligungs Gmbh & Co KG,
Defendants.

CIVIL ACTION NO. 1:10-CV-12043-GAO

**ASSENTED-TO MOTION OF THE DEFENDANT, ACHTE/NEUNTE
Boll Kino Beteiligungs Gmbh & Co KG, TO EXTEND THE TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to all applicable rules of civil procedure and the inherent authority of the Court to regulate matters before it, and with the agreement of the plaintiff, the defendant, ACHTE/NEUNTE Boll Kino Beteiligungs Gmbh & Co KG, moves for an order extending the deadline by which the defendant must move, plead, or otherwise respond to the Second Amended Complaint to and including May 18, 2011. In support of this Motion, the defendant states as follows:

1. The defendant recently received service of process and quickly retained counsel to appear on its behalf.
2. This is a new matter that will not be unduly delayed by the modest enlargement that the defendant seeks.
3. Plaintiff's counsel has assented to the requested enlargement.

For all the foregoing reasons, the defendant requests that this Motion be granted and that the deadline by which the defendant must move, plead, or otherwise respond to the Complaint be enlarged through May 18, 2011.

ACHTE/NEUNTE Boll Kino Beteiligungs
GmbH & Co KG

By its Attorneys,

/s/ Kevin C. Cain
Kevin C. Cain
BBO # 550055
Harvey Weiner
BBO # 519840
PEABODY & ARNOLD LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210-2261
(617) 951-2100

Dated: May 12, 2011.

ASSENTED TO:

/s/ Jason E. Sweet
Daniel G. Booth
BBO # 672090
Jason E. Sweet
BBO # 668596
BOOTH SWEET LLP
32R Essex Street, Suite 1
Cambridge, MA 02139
(617) 250-8602

CERTIFICATE OF SERVICE

I, Kevin C. Cain, hereby certify that on this 12th day of May, 2011, I served the within Assented-To Motion of the Defendant, ACHTE/NEUNTE Boll Kino Beteiligungs Gmbh & Co KG, to Extend the Time to Respond to Plaintiff's Complaint by causing a copy thereof to be sent electronically to the registered participants in this case, as identified on the Notice of Electronic Filing.

Dated: May 12, 2011.

/s/ Kevin C. Cain