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UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

BEAR OMNIMEDIA LLC,

Case No.: 2:17-cv-1478-MMD-CWH

Plaintiff,

vs.

(FIRST) MOTION FOR EXTENSION OF TIME FOR DEFENDANT MANIA MEDIA TO RESPOND TO THIRD AMENDED COMPLAINT

MANIA MEDIA LLC dba "BEAR FILMS" and BEARFILMS.com; CM PUBLICATIONS LIMITED aka "The magazine ALL BEAR," "ALL BEAR Special Edition," "ALL BEAR EXTRA," The "ALL BEAR Newsletter", BEAR WORLD MEDIA LTD, BEARworldMAGAZINE.com; WEBID CONSULTING LTD. Dba BEARworld.COM And BEAR411.COM; and STEVEN TILOTTA dba playBEARMAGAZINE.COM AND dba playBEAR.COM; INSTAGRAM INC., a Delaware corporation; INSTAGRAM LLC, A Delaware corporation; DOES I-X, ROE COMPANIES I-X

Defendant

(FIRST) MOTION FOR EXTENSION OF TIME FOR DEFENDANT MANIA MEDIA TO RESPOND TO THIRD AMENDED COMPLAINT - 1

1                   Defendant Mania Media LLC, by and through its counsel of record, Chad Anderson,  
2 Attorney at Law, hereby move this Honorable Court to extend by 7 days the time for it to file its  
3 response to Plaintiff's Third Amended Complaint. In support of the motion, counsel states:

4                   1. On December 14, 2017, this Court entered an Order granting Mania Media's motion to  
5 set aside clerk's entry of default (ECF No. 79);

6                   2. Within its motion to set aside clerk's entry of default, Mania Media requested that it  
7 be permitted to respond to Plaintiff's Third Amended Complaint (by way of either a Motion to  
8 Dismiss Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, a Motion to Dismiss  
9 under Nevada's anti-SLAPP statute, or an Answer) within 20 days of entry of an order granting  
10 its motion (ECF No. 66);

11                   3. As the Court granted the motion to set aside clerk's entry of default on December 14,  
12 2017, Mania Media's response is currently due January 3, 2018;

13                   4. While counsel has endeavored to finalize a response by the current due date, an  
14 extension is necessary and warranted to allow counsel to finalize a full and appropriate response  
15 that will assist the Court in addressing this matter;

16                   5. Good cause exists to allow a brief extension of 7 days for Mania Media to finalize its  
17 response, specifically, the intervening holidays between December 21 and January 3 reduced the  
18 amount of time counsel could devote to preparing a response;

19                   6. Additionally, this brief extension will not delay this matter, as Defendant Instagram  
20 has until January 31, 2018, to respond to the complaint (see ECF No. 80), and thus there is no  
21 prejudice to any party in granting Mania Media a brief extension;

22                   7. Finally, counsel has made no prior request to extend the time to respond to the  
23 complaint.

24 (FIRST) MOTION FOR EXTENSION OF TIME FOR DEFENDANT MANIA MEDIA TO RESPOND TO THIRD  
25 AMENDED COMPLAINT - 2

In light of the foregoing, Mania Media respectfully request a 7-day extension to file its response to Plaintiff's Third Amended Complaint.

Respectfully submitted this 3rd day of January, 2018

IT IS SO ORDERED.

DATED: January 4, 2018

C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed with the Court's Electronic Filing System and served on the attorneys of record for all parties in the above cause in accordance with the Federal Rules of Civil Procedure on January 3, 2018.

/s/ Chad Anderson

(FIRST) MOTION FOR EXTENSION OF TIME FOR DEFENDANT MANIA MEDIA TO RESPOND TO THIRD AMENDED COMPLAINT - 3