

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CRAIG REED, et al.,

Plaintiffs

vs.

FREEBIRD FILM PRODUCTIONS, INC., et al.,

Defendants.

CASE NO. 1:08-CV-01761

JUDGE CHRISTOPHER A. BOYKO

**MOTION TO EXCUSE THE
ATTENDANCE OF DEFENDANTS
RHI ENTERTAINMENT
DISTRIBUTION, LLC (SUCCESSOR
IN INTEREST TO NAMED
DEFENDANT HALLMARK
ENTERTAINMENT DIST., LLC)
AND LIONS GATE FILMS, INC.
(SUCCESSOR IN INTEREST TO
NAMED DEFENDANT ARTISAN
ENTERTAINMENT, INC.) FROM
THE STATUS CONFERENCE**

Defendants RHI Entertainment Distribution, LLC, (successor in interest to named defendant Hallmark Entertainment Dist., LLC) (“RHI”) and Lions Gate Films, Inc. (successor in interest to named defendant Artisan Entertainment, Inc.) (“Lions Gate”) hereby respectfully move this Court for leave not to appear in person at the status conference scheduled for December 17, 2008 in this case.

The reason for the requested excused absences are that RHI is a limited liability company headquartered in New York City, and Lions Gate is a corporation headquartered in California, and it would constitute a significant burden for either to have to appear in person at the status conference.

This matter originally was set for a telephonic status conference with the attorneys only. The undersigned, with the concurrence of other counsel, requested the conference be held in

person because counsel felt certain issues could better be addressed in person with the Court. In granting that motion, the Court indicated parties should also be present.

Given the fact this case is still in its preliminary stages, and the presence of client representatives would be expensive and likely unnecessary, these defendants respectfully request that they be excused from personal attendance. A client representative will be available by phone at the time of the status conference should any need to consult with the client arise.

Respectfully submitted,

/s/Louis A. Colombo
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*Attorneys for Defendants RHI Entertainment
Distribution, LLC and Lions Gate
Entertainment, Inc.*

CERTIFICATE OF SERVICE

A copy of the foregoing was served upon each of the defendants via the Court's electronic filing system this 11th day of December, 2008.

/s/Louis A. Colombo
*One of the Attorneys for Defendants
RHI Entertainment Distribution, LLC
and Lions Gate Entertainment, Inc.*