

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 OF DEFENDANT RHI
ENTERTAINMENT DISTRIBUTION,
LLC (SUCCESSOR IN INTEREST
TO NAMED DEFENDANT
HALLMARK ENTERTAINMENT
DIST., LLC) FOR EXTENSION OF
TIME TO FILE REPLY BRIEF IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

Defendant RHI Entertainment Distribution, LLC hereby respectfully moves this Court for an additional two (2) days, through and including March 6, 2009, to file its reply brief in support of its motion for summary judgment. This brief extension would allow defendant the ten days (excluding intermediate Saturdays and Sundays) provided by Local Rule 7.1(e) for filing a reply. Defendant has attempted to complete the reply within the time originally provided by this Court's order, but has been unable to address adequately all of the issues raised by plaintiffs in their opposition.

Counsel for plaintiffs and for the other defendants have both indicated that they have no objection to this requested extension.

Respectfully submitted,

/s/Louis A. Colombo

Louis A. Colombo (0025711)
Brandt W. Gebhardt (0079823)
BAKER & HOSTETLER LLP
3200 National City Center
1900 East Ninth Street
Cleveland, Ohio 44114
(216) 621-0200 (telephone)
(216) 696-0740 (facsimile)
lcolombo@bakerlaw.com
bgebhardt@bakerlaw.com

*Attorneys for Defendant RHI Entertainment
Distribution, LLC*

CERTIFICATE OF SERVICE

A copy of the foregoing was served upon counsel for plaintiffs and each of the defendants via the Court's electronic filing system this 4th day of March, 2009.

/s/Louis A. Colombo
One of the Attorneys for Defendants
RHI Entertainment Distribution, LLC

502313155