

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

JOHN DOE,)	CASE NO. 3:07 CV 604
)	
Plaintiff,)	JUDGE JACK ZOUHARY
)	
vs.)	
)	
SEXSEARCH.COM, ET AL.,)	<u>MOTION FOR EXTENSION OF TIME</u>
)	<u>TO ANSWER, PLEAD, OR</u>
Defendants.)	<u>OTHERWISE RESPOND TO</u>
)	<u>PLAINTIFF'S COMPLAINT</u>

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, defendants Playboy Enterprises, Inc., Club Jenna, Inc., and Jenna Massoli (professionally known as Jenna Jameson) (collectively "Defendants") hereby move for a twenty (20) day extension of time, up to and including May 3, 2007, to move, plead or otherwise respond to plaintiff's Complaint.

For the past several weeks counsel for Defendants has been working with plaintiff's counsel towards a voluntary dismissal of Defendants because they are not proper parties to this case. Last Wednesday, Defendants provided plaintiff's counsel with information that he requested, which established no ownership on the part of the Defendants in SexSearch.com. Plaintiff did not dismiss Defendants.

Yesterday, Plaintiff's counsel requested additional information from Defendants. Additionally, counsel proposed a stipulated dismissal entry that contains five terms and

conditions for Defendants' dismissal. Defendants believe that they have provided sufficient information to clearly establish that there is no reasonable or good faith basis to keep them in this case.

Defendants seek this extension to provide additional time for their dismissal. If plaintiff does not dismiss Defendants, the extension will be necessary to allow Defendants the time to properly prepare a response to plaintiff's Complaint. The Complaint contains 396 paragraphs and fifteen causes of action. Furthermore, Defendants had been under the impression that Plaintiff would be voluntarily dismissing them. This motion is not being proposed for the purpose of delay, and Defendants have sought no previous extensions to respond to plaintiff's complaint.

Plaintiff's counsel would not consent to this extension.¹

Respectfully submitted,

s/ James A. Slater Jr.

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¹ Plaintiff's counsel refused to provide his consent if Defendants did not agree to voluntarily produce the additional information he requested. Because Defendants will not agree to plaintiff's additional requests or the terms of the proposed dismissal, plaintiff's counsel would not consent to this extension.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was filed electronically with the Court's ECF system on this 13th day of April, 2007.

Notice will be sent to the parties through the Court's system.

s/ James A. Slater Jr.

One of the Attorneys for Defendants
Playboy Enterprises, Inc.,
Club Jenna, Inc., and Jenna Massoli