

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

John Doe,)	Case No. 3:07CV604
)	
Plaintiff,)	Hon. Jack Zouhary
)	
v)	
)	
SexSearch.com, et al.,)	
)	
Defendants.)	

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 Attorneys for Plaintiff

Counsel for Specially Appearing
 Defendant Cyber Flow Solutions,
 Inc.

**DEFENDANT CYBER FLOW SOLUTIONS, INC.'S
 MOTION FOR AN ORDER CONTINUING PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION AND FOR OTHER RELATED RELIEF**

Specially appearing defendant Cyber Flow Solutions, Inc. ("Cyber Flow") seeks a continuance of the hearing on Plaintiff's preliminary injunction motion and related relief. Specifically, Cyber Flow requests an order: (1) unsealing the papers Plaintiff filed in support of his *ex parte* application for a temporary restraining order ("TRO") and motion for a preliminary injunction; (2) ordering Plaintiff's counsel to serve those unsealed moving papers on these Defendants' counsel via email; (3) allowing these Defendants to file papers in opposition to the preliminary injunction motion at least 10

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days after the moving papers are served; (4) continuing the hearing on Plaintiff's preliminary injunction motion to a date convenient to the Court and after these Defendants have had an opportunity to file its papers in opposition; and (5) extending the TRO currently in effect until the Court holds the hearing on the preliminary injunction motion. As the reasons in support of these Defendants' motion are exactly the same as the reasons put forth by Defendant Experienced Internet.com, Inc. in its motion for the same relief Cyber Flow respectfully, with the permission of counsel for Experienced Internet.com, Inc., incorporate herein the arguments made in that motion as if stated anew herein.

Cyber Flow additionally adds that it has not been trying to avoid the Court and it did not deliberately fail to appear at the hearing on the motion for preliminary injunction scheduled for last week. No person involved was directly personally served; rather a process server left the service papers with a receptionist; it took a few days for the papers to get to the proper individuals within the company, and then to hire counsel. Cyber Flow has no objection to the continuance of the TRO in effect, so that Cyber Flow may have adequate time to obtain, analyze and oppose the moving papers.

s/Scott R. Torpey
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been electronically filed this 19th day of March, 2007. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's System.

s/Scott R. Torpey

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