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

John Doe,) Case No. 3:07CV604
Plaintiff,) Honorable Jack Zouhary
riamum,) DEFENDANT EXPERIENCED) INTERNET.COM, INC.'S MOTION
V.	 FOR LEAVE TO FILE BRIEF UP TO 35-PAGES IN OPPOSITION TO PLAINTIFF'S MOTION FOR
SexSearch.com, et al.,) PRELIMINARY INJUNCTION)
Defendants.	Richard M. Kerger (0015864) KERGER & ASSOCIATES 33 S. Michigan Street, Suite 100 Toledo, Ohio 43604 Telephone: (419) 255-5990 Fax: (419) 255-5997 Gary Jay Kaufman (<i>Pro hac vice</i>) Dana Milmeister (<i>Pro hac vice</i>) The Kaufman Law Group 1925 Century Park East Suite 2350 Los Angeles, California 90067 Telephone: (310) 286-2202 Fax: (310) 712-0023 Counsel for Specially Appearing Defendant Experienced Internet.com, Inc.
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Filed 04/06/2007

Specially appearing defendant Experienced Internet.com, Inc. ("EIC") hereby requests leave to file a memorandum up to 35 pages in opposition to Plaintiff's motion for a preliminary injunction. This will save the Court and parties time. EIC's counsel is cooperating with counsel for Stallion.com FSC, Limited; Manic Media, Inc.; DNR; Fiesta Catering International Inc., Mr. Damian Cross and Cyber Flow Solutions, Inc. to provide the Court with one opposition brief, with short joinders filed by the others.

However, the 20-page limit (Local Rule 7.1(f)) is not enough to cover all of the defendants' defenses to the preliminary injunction request, which include the Court's lack of jurisdiction over the defendants; procedural and substantive defenses to the relief sought, and numerous separate and independent grounds establishing Plaintiff's lack of likelihood of success on the merits. If the parties separate the arguments into separate briefs and each join in the others, no party will exceed the 20-page limit. However, if the Court permits, one main opposition brief will be filed (with short joinders by the others) if leave to file a brief not to exceed 35 pages is granted.

Respectfully submitted,

/s/ Richard M. Kerger

RICHARD M. KERGER (0015864)

Counsel for Specially Appearing Defendant

Experienced Internet.com, Inc.

/s/ Dana Milmeister

Dana Milmeister (pro hac vice)

Counsel for Specially Appearing Defendant

Experienced Internet.com, Inc.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been electronically filed this $6^{\rm th}$ day of April, 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/ Richard M. Kerger
