

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Peermusic, III, Ltd., Songs of Peer, Ltd., Peer)	
International Corp., Peermusic Ltd., PSO Ltd.,)	
Southern Music Publishing Co., Inc., WB Music)	
Corp., Warner-Tamerlane Publishing Corp.,)	Civil Acton No. 2:09-CV-01137-RCM
Unichappell Music, Inc., Bug Music, Inc.,)	
Windswept Holdings LLC and Hitco Music)	
Publishing, LLC,)	
)	Hon. Magistrate Judge Robert C. Mitchell
Plaintiffs,)	
)	
v.)	
)	
Motive Force LLC and Sean Colombo,)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF TIME

Plaintiffs Peermusic, III, Ltd., Songs of Peer, Ltd., Peer International Corp., Peermusic Ltd., PSO Ltd., Southern Music Publishing Co., Inc., WB Music Corp., Warner-Tamerlane Publishing Corp., Unichappell Music, Inc., Bug Music, Inc., Windswept Holdings LLC and Hitco Music Publishing, LLC (collectively "Plaintiffs"), and Defendants Motive Force LLC and Sean Colombo (collectively "Defendants"), jointly request that this Honorable Court grant an extension of time for Defendants to file and serve its response to the Complaint, pursuant to Fed. Rule of Civ. Proc. 6, and, in support of their motion, state as follows:

1. Plaintiffs filed the Complaint on August 24, 2009, and served Defendants on August 30, 2009.
2. This Court has previously granted the parties two extensions of time for Defendants to respond to the Complaint.
3. Since the approval of the latest extension, the parties have actively engaged in negotiating the terms of a possible resolution to this matter. The parties remain of the view that a

settlement can be achieved which will alleviate the need for expensive and protracted litigation of this matter.

4. While the parties have made progress toward reaching mutually satisfactory terms to settle this matter, the parties require additional time to reach a resolution.

5. Accordingly, the parties respectfully and jointly request that this Court grant Defendants until and including Friday, December 4, 2009 to file a response to the Complaint, by entering an Order in the form attached hereto.

/s/David E. White

David E. White - Pa. I.D. No. 59659
BABST, CALLAND, CLEMENTS &

ZOMNIR, PC
Two Gateway Center
603 Stanwix Street
6th Floor
Pittsburgh, PA 15222
(412) 394-5400
(412) 394-6576 (fax)

Paul M. Fakler - NY Bar No. 2940435
(*pro hac vice* admission pending)

Ross J. Charap - NY Bar No. 1117381
(*pro hac vice* admission pending)

MOSES & SINGER LLP
405 Lexington Avenue
New York, NY 10174-1299
212-554-7800
212-554-7700 (fax)

Counsel for Plaintiffs

Dated: November 18, 2009

/s/Corrado Salvatore

Gretchen L. Jankowski - Pa. I.D. No. 74540
Corrado Salvatore - Pa. I.D. No. 203639
BUCHANAN INGERSOLL & ROONEY PC
Firm I.D. No. 038
301 Grant Street
One Oxford Centre, 20th Floor
Pittsburgh, PA 15219-1410
(412) 562-1417/1825

Counsel for Defendants
Motive Force LLC and Sean Colombo