

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
IN NASHVILLE**

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS, et al.,

Defendants

Civil Action No. 3:09-0442

Judge Wiseman

Magistrate Judge Griffin

FILED UNDER SEAL

**MOTION TO EXTEND DEADLINE
FOR FILING AMENDED COMPLAINT**

Plaintiff Taylor Swift (“Plaintiff”), by and through her undersigned counsel, respectfully requests that the Court extend the deadline for Plaintiff’s filing of an amended complaint, until a date to be subsequently set by the Court.

At the Initial Case Management Conference held by the Court on June 29, 2009 and the Case Management Conference held by the Court on August 26, 2009, Plaintiff advised the Court that Plaintiff’s 2009 “Fearless” Tour may be extended beyond October 10, 2009, the last date that is presently identified in the Preliminary Injunction and Seizure Order with respect to the potential locations of Counterfeit Goods. By subsequent Order, dated August 27, 2009 (Document 52), the Court ordered that Plaintiff advise the Court, by October 5, 2009, of whether Plaintiff’s Tour will be extended, and if so, file a motion to extend the time period in the Preliminary Injunction and Seizure Order and to extend the deadline to file an amended complaint. Accordingly, Plaintiff advises that Plaintiff’s “Fearless” Tour will be extended

through June 2010 and respectfully requests that the Court extend the deadline for Plaintiff's filing of an amended complaint, until further orders of the Court.¹

WHEREFORE, Plaintiff moves this Court to extend the deadline of October 5, 2009 for Plaintiff's filing of an amended complaint.

Respectfully submitted,

/s/ Natalya L. Rose

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Attorneys for Plaintiff

Taylor Swift

¹ Plaintiff will file separately the Motion to Extend Time Period and Supplement Locations Identified in Preliminary Injunction and Order of Seizure of Counterfeit Goods.

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing Plaintiff's Motion to Extend Deadline for Filing Amended Complaint is being accomplished through delivery by U.S. Mail, this 1st day of October, 2009, upon the following:

Martin D. Quattlebaum
8556 Kendrick Road
Jonesboro, Georgia 30126

Robert Vincent Estronza
1281 Brockett Road
Clarkston, GA 30021

/s/ Natalya L. Rose
Natalya L. Rose