

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GOOSEBERRY NATURAL
RESOURCES, LLC,

Plaintiff,

v.

CONDESA, INC., MASS MEDIA
DISTRIBUTION, LLC, MEK ENTERPRISES
d/b/a ERELEASES.COM, PROVEN WAYS,
INC., PR WORLDWIDE, INC., and RV MEDIA,
LLC d/b/a PR 18 NETWORK.

Defendants.

Civil Action No. 2:10-CV-210 TJW

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO

PLAINTIFF'S COMPLAINT

Defendant Mass Media Distribution, LLC (“Mass Media”) respectfully moves this Court for an extension of time for Mass Media to respond to Plaintiff’s Complaint, via an answer, special appearance, and/or motion, and would show the Court as follows:

1. On June 24, 2010, Plaintiff filed its Complaint.
2. On July 9, 2010, Plaintiff served defendant Mass Media with Plaintiff’s Complaint.
3. Pursuant to Federal Rules of Civil Procedure 12(a)(1)(A) and 6(d), defendant Mass Media’s response to Plaintiff’s Complaint is due on July 30, 2010.
4. On July 23, 2010, the undersigned attorney for defendant Mass Media telephoned Melissa Richards Smith, attorney for Plaintiff. Plaintiff agreed to a sixty –day extension of the deadline for defendant Mass Media to respond to Plaintiff’s Complaint.

Wherefore, defendant Mass Media respectfully requests that the Court enter an order extending the time for defendant Mass Media to respond to Plaintiff’s Complaint to September 28, 2010.

Dated: July 26, 2010

Respectfully submitted,

/s/ Frederic M. Douglas

Frederic M. Douglas

California Bar. No. 212778

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**ATTORNEY FOR DEFENDANT MASS
MEDIA DISTRIBUTION, LLC**

Certificate of Service

I hereby certify that on July 26, 2010, I filed the foregoing document electronically in compliance with Local Rule CV-5(a), constituting electronic service upon counsel of record that have consented to electronic service, pursuant to Local Rule CV-5(a)(3)(A). All other counsel of record were served with a true and correct copy of the foregoing by U.S. mail or facsimile transmission, on this the 26th day of July 2010.

/s/ Frederic M. Douglas
