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Attorneys for Plaintiff Incentive Capital, LLC

**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION**

INCENTIVE CAPITAL, LLC, a Utah Limited
 Liability Company,

Plaintiff,

v.

CAMELOT ENTERTAINMENT GROUP,
 INC., a Delaware Corporation; CAMELOT
 FILM GROUP, INC., a Nevada Corporation;
 CAMELOT DISTRIBUTION GROUP, INC.,
 a Nevada Corporation, ROBERT P. ATWELL,
 an individual; JAMIE R. THOMPSON, an
 individual; STEVEN ISTOCK, an individual;
 TED BAER, an individual; PETER
 JAROWEY, an individual,

Defendants.

**PLAINTIFF’S MOTION FOR
 EXTENSION OF TIME TO
 RESPOND TO DEFENDANT TED
 BAER’S MOTION TO DISMISS
 PLAINTIFF’S AMENDED
 COMPLAINT FOR LACK OF
 JURISDICTION**

Civil No. 2:11-cv-00288

Judge Paul Warner

Plaintiff Incentive Capital, LLC (“Plaintiff” or “Incentive”), by and through its counsel, hereby move, pursuant to DUCivR 77-2, for an order extending once, for seven (7) days, the time within which to respond to Defendant Ted Baer’s *Motion to Dismiss Plaintiff’s Amended Complaint for Lack of Jurisdiction (Docket No. 43)* (“Baer’s Motion to Dismiss”).

The current deadline for filing the opposition memorandum is Friday June 17, 2011. Plaintiff has not previously requested an extension with respect to opposing Baer's Motion to Dismiss, and has insufficient time to complete the complicated and lengthy opposition brief) (necessitated by the jurisdictional challenge raised by Baer's Motion to Dismiss) in light of certain deadlines and hearings in unrelated cases and due to the fact that much of Plaintiff's time and efforts have been devoted to litigating a substantially similar dispute between the parties which is currently pending before the Federal Central District Court of California in an attempt to obtain a dismissal or transfer of such action to this Court. Baer's Motion to Dismiss has serious implications for Plaintiff's case and Plaintiff's counsel needs additional time to carefully and adequately brief the complex procedural and jurisdictional issues raised therein.

WHEREFORE, Plaintiff pray for an Order extending its time to file its opposition memorandum to Baer's Motion to Dismiss to Friday **June 24, 2011**. A Proposed Order is filed concurrently herewith.

DATED this 14th day of June, 2011.

PIA ANDERSON DORIUS REYNARD & MOSS

/s/ Joseph G. Pia
Joseph Pia

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of June, 2011, I caused a true and correct copy of PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT TED BAER'S MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT FOR LACK OF JURISDICTION to be filed with the Clerk of the Court using the CM/ECF system which served the following pursuant to Rules 5(b)(2)(D) and (E) of the Federal Rules of Civil Procedure:

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/s/ Joseph Pia