

1 FLOYD E. IVEY
 2 Liebler, Ivey, Connor, Berry & St. Hilaire
 3 P. O. Box 6125
 4 Kennewick, WA 99336-0125
 5 509-735-3581
 6 Attorneys for Defendant
 7 Impulse Marketing Group, Inc.
 8 and Third Party Plaintiff

9 Klein, Zelman, Rothermel, & Dichter, L.L.P.
 10 By: Sean Moynihan, Esq.; Peter Glantz
 11 485 Madison Avenue
 12 New York, New York 10022
 13 Telephone Number (212) 935-6020
 14 Facsimile Number (212) 753-8101
 15 Attorneys for Defendant
 16 Impulse Marketing Group, Inc.
 17 and Third Party Plaintiff

18 **UNITED STATES DISTRICT COURT FOR THE**
 19 **EASTERN DISTRICT OF WASHINGTON**

20 JAMES S. GORDON, JR.,

21 Plaintiff,

22 vs.

23 IMPULSE MARKETING GROUP,
 24 INC.,

25 Defendant

No. CV-04-5125-FVS

THIRD PARTY PLAINTIFF'S
 MOTION FOR EXTENSION TO
 ANSWER DISCOVERY FROM
 JAMES GORDON III

26 _____
 27 IMPULSE MARKETING GROUP,
 28 INC.,

Third-Party Plaintiff,

vs.

BONNIE GORDON, et al.,

Third-Party Defendants.

Third Party Plaintiff requests an extension to File Responses to Discovery from James Gordon III. All Third Party Defendant's, who have had discovery due, have agreed to extensions. Multiple attempts have been made by counsel for

1 Third Party Plaintiff to contact James Gordon III with no response. There is no
2 indicated prejudice. The Responses were served on March 8, 2006,
3 contemporaneous with responses to like discovery from Jonathan Gordon, served
4 contemporaneously with that of James Gordon III.

5 The request is to extend the date of response to March 8, 2006.

6 DATED this 8th day of March, 2006.

7 LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE

8
9 By s/ FLOYD E. IVEY

10 FLOYD E. IVEY, WSBA#6888
11 Attorneys for Defendant
12 1141 N. Edison, Suite C
13 P.O. Box 6125
14 Kennewick, Washington 99336
15 Local Counsel for Defendant
16 Impulse Marketing Group, Inc.

17 S/ SEAN MOYNIHAN & PETER J. GLANTZ

18 Sean A. Moynihan & Peter J. Glantz
19 Klein, Zelman, Rothermel & Dichter, LLP
20 485 Madison Avenue, 15th Floor
21 New York, New York 10022
22 (212) 935-6020
23 (212) 753-8101 (fax)

24 I hereby certify that on March 8, 2006, I electronically filed
25 DEFENDANT'S REQUEST FOR EXTENSION TO FILE RESPONSE TO
26 DISCOVERY OF JAMES GORDON III with the Clerk of the Court using the
27 CM/ECF System which will send notification of such filing to Robert Siegel, Peter
28 J. Glantz and Sean A. Moynihan. I hereby certify that I have served the foregoing
to the following non-CM/ECF participants by other means: Bonnie Gordon,
Jonathan Gordon, James S. Gordon, III, Robert Pritchett, Jamila Gordon and
Emily Abbey.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

S/ FLOYD E. IVEY
FLOYD E. IVEY