

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

Floyd E. Ivey  
Liebler, Ivey & Connor, P.S.  
1141 N. Edison, Suite C  
P.O. Box 6125  
Kennewick, WA 99336  
Telephone (509) 735-3581  
Fax (509) 735-3585

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON**

JAMES S. GORDON, JR., an individual  
residing in Benton County, Washington,

Plaintiffs

vs.

IMPULSE MARKETING GROUP, INC.,  
a Nevada Corporation,

Defendants

NO. CV-04-5125-FVS

DEFENDANT'S AGREED  
MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE  
TO PLAINTIFF'S MOTION  
TO DISMISS OR FOR  
SUMMARY JUDGMENT

Defendant Impulse Marketing Group, Inc. now request an extension of time to file its Response to Plaintiff's Motion to Dismiss or for Summary Judgment scheduled for hearing September 28, 2005. Defendant's Response is due August 29, 2005. The Plaintiff agrees to an extension of time to file Defendant's Response to September 7, 2005. This motion is based on the Declaration of Floyd E. Ivey of August 22, 2005.

DATED this 23th day of August, 2005.

LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE

By /s/ FLOYD E. IVEY  
FLOYD E. IVEY, WSBA #6888  
Local Counsel for Defendant

LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE  
Attorneys at Law  
P.O. Box 6125  
Kennewick, Washington 99336-0125  
(509) 735-3581

Defendant's Motion For Extension of Time to File  
Response to Plaintiff's Motion to Dismiss and for  
Summary Judgment - 1.

Z:\IPClient\ImpulseMarketingGroup v. Gordon\Pleadings\Plaintiff Motion for  
Summary Judgment\Defendant.Motion.Extension.Time.File.Response.050822.wpd

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

KLEIN, ZELMAN, ROTHERMEL & DICHTER, LLP

By PETER J. GLANTZ by telephone authority by  
/S/FLOYD E. IVEY  
PETER J. GLANTZ  
Attorneys for Defendant

I hereby certify that on August 23, 2005, I electronically filed **Defendant's Agreed Motion for Extension of Time to File Response to Plaintiff's Motion to Dismiss or for Summary Judgment** with the Clerk of the Court using the CM/ECF System which will send notification of such filing to Douglas E. McKinley, Jr. and transmitted via internet to Peter Glantz.

S/ FLOYD E. IVEY  
FLOYD E. IVEY

LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE  
Attorneys at Law  
P.O. Box 6125  
Kennewick, Washington 99336-0125  
(509) 735-3581

Defendant's Motion For Extension of Time to File Response to Plaintiff's Motion to Dismiss and for Summary Judgment - 2.