

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION
Case No: 3:20-cv-5097-RV/EMT**

GENESIS MOVIE LLC)
)
 Plaintiff,)
)
 v.)
)
 SEVENFOLD FILMS, LLC and)
 RALPH STREAN,)
)
 Defendants.)

**JOINT MOTION FOR
EXTENSION**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rules 6.1 and 7.1(G)(1), the parties jointly move the Court for a fourteen-day (14) extension through and including June 11, 2020 for Plaintiff to serve its Response to Defendants’ Sevenfold Films, LLC and Ralph Strean’s Motions to Dismiss for Failure to State a Claim [D.15 and D.16] and for Plaintiff to file an Amended Complaint, and for a fourteen-day (14) extension for Defendants to respond to the Amended Complaint through and including July 9, 2020. In support of this motion, the parties state as follows:

1. Defendants’ motions to dismiss were filed on May 14, 2020 making Plaintiff’s responses due May 28, 2020. Plaintiff plans to submit an amended complaint to respond in part to Defendants’ motion, and to take into account additional, recently discovered issues. The deadline to amend the Complaint has

not passed and Defendants consent to the filing of the amended pleading.

2. Counsel for Plaintiff has a long-planned family vacation that is scheduled to start this Friday, May 22 and continue through the following week and requires additional time to prepare the response and Amended Complaint.

3. Plaintiff's Amended Complaint to be filed on June 11, 2020 would make Defendant's response to the Amended Complaint due June 25, 2020.

4. Counsel for Defendants requires additional time to respond to the Amended Complaint and Plaintiff consents to the said extension.

5. These extensions are not being requested for the purpose of causing undue delay.

WHEREFORE, the parties respectfully request that this Court grant the requested extension up to and including June 11, 2020, for Plaintiff to respond to Defendants' Motion to Dismiss and to file an Amended Complaint, and up to and including July 9, 2020 for Defendants to respond to the Amended Complaint.

Respectfully submitted, this the 21st day of May, 2020.

Michael Best & Friedrich LLP
Attorneys for Plaintiff

Scott Patent and Legal Services
Attorneys for Defendant

By: /s/ Anthony J. Biller
Anthony J. Biller, *pro hac vice*
NC Bar No. 24,117
Emily M. Haas, *pro hac vice*
NC Bar No. 39,716
2501 Blue Ridge Road, Suite 390
Raleigh, NC 27607
Telephone: 984-220-8750
Facsimile 877-398-5240
Email: abjiller@michaelbest.com
emhaas@michaelbest.com

By: /Steven R. Scott/
Steven R. Scott
FL Bar No.0310158
462 Kingsley Ave.
Suite 101
Orange Park, Florida 32073
Telephone: 904-289-9378
Email: srscott@wildblue.net

CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of May, 2020, the foregoing **JOINT MOTION FOR EXTENSION** was filed using the Court's CM/ECF filing system, which will provide notice of the filing to all counsel of record as follows:

Steven R. Scott
Scott Patent and Legal Services
462 Kingsley Ave. Suite 101
Orange Park, Florida 32073
srscott@wildblue.net

By: /s/ Anthony J. Biller
Anthony J. Biller, *pro hac vice*
NC Bar No. 24,117
MICHAEL BEST & FRIEDRICH, LLP
2501 Blue Ridge Road, Suite 390
Raleigh, NC 27607
Telephone: 984-220-8750
Facsimile 877-398-5240
Email: abjiller@michaelbest.com