

JEZIC, KRUM & MOYSE, LLC

ANDREW V. JEZIC*
DAVID M. KRUM^
DAVID H. MOYSE^
RAND W. LUCEY^
AMAL A. BERTRAND^
T. BRUCE GODFREY*
JONATHAN R. CARROLL^
ROBERT S. GRABO<
JONATHAN R. OATES^^
DAVID M. WOOTEN*
HIMEDES V. CHICAS^
RAQUEL M. SMITH^
JENNIFER S. WINTERS^
JAMIE L. ALVARADO-TAYLOR^

2730 UNIVERSITY BOULEVARD WEST
SUITE 604
WHEATON, MARYLAND 20902-1975
240-292-7200
Facsimile 240-292-7225

307 E. Annandale Road, Suite 201
Falls Church, VA 22042

1200 G Street, Suite 800
Washington, DC 20005

ANTEZANA & ANTEZANA+ Of Counsel
STEVE NORMAN > Of Counsel
IVAN YACUB+ Immigration of Counsel

LICENSED in MARYLAND^
LICENSED in MD and D.C.*
LICENSED in MD, D.C. and C.A. <
LICENSED in MD and VA^^
LICENSED in MD and DE >
LICENSED in MD, D.C. and VA+

October 8, 2014

The Honorable George J. Hazel
United States District Court
By electronic transmission

Re: Kimberlin v. National Bloggers Club, et al.
8:13-cv-03059-GJH
Joint Request for Deadline Extension

Dear Judge Hazel:

Greetings; I write on behalf of myself and co-counsel Ronald Coleman, Esquire, of New York in reference to our clients Defendants Mr. Patrick Frey, Ms. Mandy Nagy and Ace of Spades. The purpose of this letter is to request jointly with Plaintiff Mr. Brett Kimberlin an extension on two deadlines in this case, specifically:

- 1) Defendant Ace of Spades's deadline to file an Answer to Plaintiff's most recently Amended Complaint; and
- 2) Mr. Kimberlin's deadline to file an omnibus response to the previously Motion to Dismiss of Defendants Frey and Nagy and of all other Defendants who have filed similar motions, per the Court's prior letter order.

The purpose of this joint request is to accommodate the potential of settlement offers and responses regarding certain Defendants, and to make allowance for the practicalities of the Jewish religious calendar for Defendants' counsel. We would ask for the Court to extend Nagy and Frey's Answer deadline to Friday, October 24, 2014, and Mr. Kimberlin's omnibus response deadline to Friday, November 14, 2014.

Hon. George Hazel

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I proffer as a court officer that Mr. Kimberlin has been provided a copy of this letter electronically, and that he has provided me electronic authorization to file it in its current form.

Finally, I note as a housekeeping matter that my business address has changed from Reisterstown to Wheaton, Montgomery County, Maryland through my new position with Jezic, Krum & Moyse, LLC.

Ron Coleman and I thank the Court for its consideration of this request; Mr. Kimberlin has authorized me to extend his thanks to the Court as well.

Yours sincerely,

/s/ (by electronic transmission)

Bruce Godfrey, Attorney #24596