

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

MALIBU MEDIA, LLC,

Plaintiff,

v.

GREGORY WEAVER,

Defendant.

CASE NO. 8:14-cv-01580

PLAINTIFF'S UNOPPOSED MOTION TO ENLARGE PRETRIAL DEADLINES

Undersigned counsel, on behalf of Plaintiff Malibu Media, LLC ("Plaintiff"), files this Motion to request the enlargement of all pre-trial deadlines in this case, pending resolution of undersigned's recently-filed Motion to Withdraw, and states:

1. There are a number of pre-trial deadlines scheduled for this and next month, including today's deadline for the parties to meet to prepare a Joint Final Pretrial Statement and the April 28, 2016 deadline for filing same. *See* CM/ECF 128.

2. Counsel for Plaintiff and Defendant Gregory Weaver had been working together to achieve and meet these deadlines.

3. Unfortunately, Plaintiff has failed substantially to fulfill its obligations to undersigned regarding undersigned's services and Plaintiff has recently rendered undersigned's representation unreasonably difficult. Based on these circumstances, undersigned cannot continue representing Plaintiff, and has filed a motion requesting authorization to withdraw, and asking the Court to grant Plaintiff sixty (60) days to retain substitute counsel. *See* CM/ECF 132.

4. In light of the foregoing, undersigned files this Motion to request a stay or enlargement of the pending pretrial deadlines pending adjudication of Plaintiff's motion to

withdraw and so that Plaintiff has an adequate opportunity to retain substitute counsel.

WHEREFORE, undersigned requests that the Court enter an order staying or enlarging the pretrial deadlines.

Respectfully submitted,

LIPSCOMB EISENBERG & BAKER, PL

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Attorneys for Plaintiff

CERTIFICATE OF GOOD FAITH CONFERRAL

I hereby certify that I conferred with Defense Counsel in a good faith effort to resolve the issues raised in this Motion. Defense Counsel does **not** oppose Plaintiff's requested relief.

By: /s/ Daniel C. Shatz

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Daniel C. Shatz