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August 31, 2016

BY ECF

The Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: *Global Interactive Media, Inc. v. Sirius XM Holdings Inc.,* U.S. District Court, S.D.N.Y., Civil Action No. 1:16-cv-06379-JGK

Dear Judge Koeltl:

Pursuant to Your Honor's Individual Practices, I write on behalf of the defendant, Sirius XM Holdings Inc. ("Sirius XM"), in the above captioned action, to request a 30-day extension for Sirius XM to answer or otherwise respond to the Complaint. The original deadline for Sirius XM to answer or otherwise respond to the Complaint was August 4, 2016. The parties previously requested a 30-day extension of this deadline in connection with their Agreed Motion to Transfer the action to the Southern District of New York. *See* ECF No. 8, \P 3. This was the only previous request for an extension of this deadline. This request was granted, making the current deadline for Sirius XM to answer or otherwise respond to the Complaint. The September 3, 2016. *See* ECF No. 10.

The plaintiff, Global Interactive Media, Inc., consents to this extension. The parties agree that it would be beneficial to have additional time for counsel to discuss if the parties may be able to resolve the pending dispute.

Respectfully Submitted,

<u>/s/ Mark A Baghdassarian</u> Mark A. Baghdassarian

cc: All counsel of record

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