

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**B.E. TECHNOLOGY, L.L.C.,**

**PLAINTIFF,**

**v.**

**PEOPLE MEDIA, INC.**

**DEFENDANT.**

**CIV. A. NO. 2:12-cv-02833-JPM**

**DEFENDANT PEOPLE MEDIA, INC.'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND AND MEMORANDUM IN SUPPORT THEREOF**

Defendant, People Media, Inc., respectfully moves the Court for an extension of time for People Media to respond to Plaintiff's Motion to Dismiss under Federal Rule of Civil Procedure 12(b)(6) and to Strike under Federal Rule of Civil Procedure 12(f) (Dkt. 33), which Plaintiff filed on January 25, 2013.

1. Plaintiff's motion seeks relief under both Rule 12(b) and Rule 12(f).
2. Pursuant to Local Rule 12.1, a party opposing a motion to dismiss under Rule 12(b) must file a response within 28 days. However, pursuant to Local Rule 7.2, a party opposing a motion to strike under Rule 12(f) must file a response within 14 days.
3. In the interest of efficiency, People Media prefers to address all of the issues Plaintiff raised in its motion in a single response.
4. People Media therefore requests that the Court grant an extension of time to respond to the portion of Plaintiff's motion seeking relief under Rule 12(f) such that the deadline for People Media's combined response is February 25, 2013.

WHEREFORE, People Media respectfully requests that the Court grant this motion and allow it up to and including February 25, 2013 in which to file a combined response to Plaintiff's

Motion to Dismiss Under Fed. R. Civ. P. 12(b)(6) and Motion to Strike Under Fed. R. Civ. P. 12(f).

Dated: February 11, 2013

Respectfully submitted,

By: /s/ Steven G. Schortgen

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**ATTORNEYS FOR DEFENDANT  
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### CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), I certify that counsel for Defendant, Jon Rose, discussed the relief requested in this Motion with counsel for Plaintiff, Adam Simpson, on February 11, 2013. The consultation was successful, as Mr. Rose and Mr. Simpson were able to reach an agreement on the issues presented in the Motion. Adam Simpson advised that the Plaintiff consents to the relief sought in the Motion.

/s/ Steven G. Schortgen  
Steven G. Schortgen

### CERTIFICATE OF SERVICE

The foregoing document was filed on the Court's CM/ECF system automatically effecting service on counsel of record for all other parties who have appeared in this action on the date of such service.

/s/ Steven G. Schortgen  
Steven G. Schortgen