

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

MALIBU MEDIA, LLC,)
)
 Plaintiff,)
 v.) Civil Action No.
) 0:14-cv-61957-JIC
 ROBERT DARE,)
)
 Defendant.)
)
 _____)

**DEFENDANT'S NOTICE OF INTENT TO FILE RESPONSE TO PLAINTIFF'S SECOND
MOTION FOR EXTENTION OF TIME TO COMPLETE DISCOVERY AND
MOTION TO COMPEL PRODUCTION OF COMPUTER DEVICE [DE 69]**

COMES NOW Defendant, ROBERT DARE, by and through his undersigned counsel, and hereby notifies the Court of his intent to file a response memorandum in opposition to Doc. 69, Plaintiff's Second Motion for an Extension of Time Within Which to Complete Discovery and Motion to Compel Production of Newly Disclosed Computer, which was filed on October 14, 2015.

Defendant has identified numerous inaccurate and misleading statements in this motion, which did not request an expedited briefing period, and asks this Honorable Court to honor the 14-day briefing period provided in Local Rule 7.1(c) so Defendant can provide a detailed response. Accordingly, pursuant to Local Rule 7.1(c)(1)(A), Defendant intends to file a response on or before November 2, 2015.

CERTIFICATE OF SERVICE

I hereby certify that on **October 15, 2015**, I filed electronically the foregoing with the Clerk of the Court via CM/ECF system, which will notify electronically all parties.

Attorney for Defendant:

Cynthia Conlin, P.A.

1643 Hillcrest Street

Orlando, Florida 32803-4809

Tel. 405-965-5519/Fax 405-545-4395

www.conlinpa.com

/s/ Cynthia Conlin, Esq.

[X] CYNTHIA CONLIN, ESQ.

Florida Bar No. 47012

Cynthia@cynthiaconlin.com

[] JENNIFER REED, ESQ.

Florida Bar No. 104986

Jennifer@cynthiaconlin.com

Secondary Email for Service:

Jeff@cynthiaconlin.com