

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>2:13-cv-12217-VAR-RSW</u>
	)	
v.	)	
	)	
GERALD SHEKOSKI,	)	
	)	
Defendant.	)	
	)	

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**PLAINTIFF’S MOTION FOR EXTENSION OF TIME  
FOR PATRICK PAIGE TO SUPPLEMENT HIS AFFIDAVIT**

Plaintiff, Malibu Media, LLC (“Plaintiff”), by and through undersigned counsel hereby moves for entry of an order extending the time for Patrick Paige to supplement his affidavit and states:

1. On September 17, 2014, the Court entered an order instructing Patrick Paige to supplement his affidavit by today, September 23, 2014.
2. Because of a clerical calendaring error, Plaintiff did not notice the deadline until after business hours, which made it impossible to secure the supplement from Patrick Paige.
3. As such, Plaintiff requests one (1) additional day for Patrick Paige to supplement his affidavit.
4. Extending the foregoing deadline will not prejudice Defendant.
5. No other case management deadlines will be affected by granting the instant Motion.
6. This request is made in good faith and not made for the purpose of undue delay.

7. Undersigned attempted to confer twice, via telephone, with defense counsel Lincoln Herweyer prior to filing the instant Motion. However, defense counsel has not responded as of the time of this filing.

WHEREFORE, Plaintiff, Malibu Media, LLC, respectfully requests that this Court enter an order extending the time within which Patrick Paige has to supplement his affidavit. A proposed order is attached for the Court's convenience.

DATED: September 23, 2014.

Respectfully submitted,

NICOLETTI LAW, PLC

By: /s/ Paul J. Nicoletti  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2014, 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/ Paul J. Nicoletti