

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

MALIBU MEDIA, LLC	
Plaintiff,	
v.	Case No. 1:13-cv-00205-WTL-MJD
KELLEY TASHIRO	Hon. Mark J. Dinsmore
Defendants	

UNOPPOSED
**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO:
PLAINTIFF'S MOTION FOR ENTRY OF AN ORDER REQUIRING DEFENDANT TO SHOW
CAUSE WHY SANCTIONS SHOULD NOT BE ENTERED AGAINST HER FOR SPOILIATION OF
EVIDENCE AND PERJURY (ECF DOC. 76)**

NOW COMES KELLEY TASHIRO ("Tashiro"), by and through counsel, Jonathan LA Phillips, who moves this Honorable Court to extend the time to File a Response to Plaintiff's Motion for Entry of an Order Requiring Defendant to Show Cause Why Sanctions Should Not Be Entered Against Her For Spoliation of Evidence and Perjury (the "Motion"), and in support thereof states:

1. The Motion was filed on February 12, 2014. Per local rule response is due by February 27, 2014. L.R. 7-1(c)(2)(A).
2. Due to the unexpected allegations leveled in the Motion, Tashiro requires additional time to ascertain the veracity of the averments of Mr. Paige. This constitutes good cause under Local Rule 7-1(c)(3).
3. It is hoped that fourteen days will provide sufficient time to retain an expert, to ascertain the veracity of Mr. Paige's findings, and to respond to the Motion.
4. Per at least two conversations, Counsel for Plaintiff does not oppose a fourteen-day extension of time to respond to the Motion.

5. It would be just and appropriate to extend the time for filing the Motion until March 13, 2014, and set the date for reply as March 20, 2014.

Respectfully submitted,

/s/Jonathan LA Philips
Jonathan LA Phillips
One of Tashiro's Attorneys
456 Fulton St.
Ste. 255
Peoria, IL 61602
309.494.6155
jphillips@skplawyers.com

Certificate of Service

I certify that on February 24, 2014 a copy of the foregoing has been filed with the Clerk of the Court via the Court's ECF filing system, thereby serving it upon all counsel of record.

/s/ Jonathan LA Phillips