

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FELD ENTERTAINMENT, INC.,)	
)	
Plaintiff,)	
v.)	Case No. 1:07-cv-1532 (EGS/JMF)
)	
ANIMAL WELFARE INSTITUTE, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**DEFENDANTS’ MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO
PLAINTIFF’S SECOND AMENDED COMPLAINT**

In accordance with Fed. R. Civ. P. 6(b), Defendants Animal Welfare Institute, The Fund for Animals, Inc., Born Free USA, The Humane Society of the United States, The Wildlife Advocacy Project, Meyer, Glitzenstein & Crystal, Katherine A. Meyer, Eric R. Glitzenstein, Howard M. Crystal, Jonathan Lovvorn and Kimberly Ockene (collectively, the “Defendants”), by and through their undersigned counsel, respectfully submit this Motion for Enlargement of Time to Respond to Plaintiff Feld Entertainment, Inc.’s (“Feld”) Second Amended Complaint [ECF No. 213] (the “SAC”).

The grounds for this Motion are set forth in the accompanying Memorandum of Points and Authorities that is submitted concurrently herewith.

In accordance with Local Rule 7(m), counsel for Defendants met and conferred in good faith with counsel for Feld in an effort to resolve the issues presented by this Motion. Feld does not consent to the thirty (30) day enlargement requested herein. However, Feld consented to an additional two (2) weeks to answer or otherwise respond.

WHEREFORE, Defendants respectfully request that this Honorable Court grant this

Motion and the proposed thirty (30) day enlargement of time until April 21, 2014, to file

Defendants' Answer and/or otherwise respond to Plaintiff's SAC. A proposed Order is attached.

DATE: March 11, 2014

**Respectfully submitted,
DEFENDANTS**

By Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 11th day of March, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

_____/s/_____
Stephen L. Neal, Jr.