

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

Case No. 07-21403-CIV-COHN/SELTZER

ANTONIO HERNANDEZ,
Individually and on behalf of all
others similarly situated,

Plaintiff,

v.

IGE U.S. LLC,
a Delaware corporation,

Defendant.

_____ /

**JOINT MOTION FOR BRIEF ENLARGEMENT OF TIME
TO FILE JOINT STATUS REPORT**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiff Antonio Hernandez (“Mr. Hernandez”) and Defendant Affinity Media Holdings, LLC a/k/a IGE U.S. LLC (“IGE U.S.”) (together, “the Parties”) jointly move this Court for an order granting a brief, seven-day enlargement of time to file a Joint Status Report. Pursuant to Plaintiff’s Motion to Compel Answers to Request for Production and Interrogatories, and for extension of discovery limits [D.E. 58], this Court issued a July 7, 2008 Order [D.E. 61] requiring the Parties to confer on the issues raised by the motion and to file a Joint Status Report detailing the outcome of their meeting by 5 p.m. EST, July 11, 2008.

The Parties are diligently pursuing settlement negotiations at this time. In view of those ongoing discussions, the Parties hereby jointly request a seven-day suspension of the deadline to file a Joint Status Report. Should such filing still be necessary, the Parties will comply no later

{M2705497;1}

than 5 p.m. EST, on July 18, 2008. The relief requested herein will prejudice neither party, but rather will facilitate the efficient disposition of this matter.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3

Pursuant to Local Rule 7.1.A.3, undersigned counsel for IGE U.S. certifies that on July 11, 2008, he contacted Plaintiff's counsel, Don Haviland, to confer in a good faith effort to resolve the issues raised by this motion, and that Mr. Haviland agreed to the relief requested herein and agreed to file this motion jointly

Dated: July 11, 2008

<p>NEWSOME LAW FIRM 20 North Orange Avenue Suite 800 Orlando, Florida 32801 Tel. (407) 648-5977 Fax (407) 648-5252 email: newsome@newsomelaw.com</p> <p>THE HAVILAND LAW FIRM, LLC 740 South Third Street, 3rd Floor Philadelphia, Pennsylvania 19147 Tel. (215) 609-4661 Fax (215) 392-4400 email: haviland@havilandlaw.com</p> <p>By: /s/ <u>C. Richard Newsome</u> C. Richard Newsome Florida Bar No. 827258 Donald E. Haviland, Jr. Pennsylvania Bar No. 66615</p> <p><i>Attorneys for Plaintiff Antonio Hernandez</i></p>	<p>AKERMAN SENTERFITT One S.E. 3rd Avenue, 25th Floor Miami, FL 33131-1714 Phone: (305) 374-5600 Fax: (305) 374-5095 Email: james.miller@akerman.com</p> <p>By: /s/ <u>Samuel S. Heywood</u> James M. Miller, Esq. Florida Bar Number: 201308 Samuel S. Heywood, Esq. Florida Bar Number: 0016604</p> <p><i>Attorneys for Defendant IGE U.S. LLC</i></p>
--	--

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing was served by using the Southern District of Florida's CM/ECF system on July 11, 2008, on all counsel or parties of record on the attached service list.

By: /s/ Samuel S. Heywood
Samuel S. Heywood, Esq.

SERVICE LIST

Hernandez v. IGE U.S. LLC, Case No. 07-21403-CIV (COHN/SELTZER)

C. Richard Newsome
newsome@newsomelaw.com
NEWSOME LAW FIRM
20 North Orange Avenue
Suite 800
Orlando, Florida 32801
Tel. (407) 648-5977
Fax (407) 648-5252

Donald E. Haviland, Jr.
haviland@havilandlaw.com
THE HAVILAND LAW FIRM, LLC
740 South Third Street, 3rd Floor
Philadelphia, Pennsylvania 19147
Tel. (215) 609-4661
Fax (215) 392-4400

Attorneys for Plaintiff Antonio Hernandez

James M. Miller, Esq.
james.miller@akerman.com
Samuel S. Heywood
samuel.heywood@akerman.com
AKERMAN SENTERFITT
One S.E. 3rd Avenue, 25th Floor
Miami, FL 33131-1714
Tel. (305) 374-5600
Fax (305) 374-5095

Attorneys for Defendant IGE U.S. LLC

