

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CAPITOL RECORDS, INC., et al. <div style="text-align: right;">Plaintiffs,</div>	)	
	)	Civ. Act. No. 03-CV-11661-NG
v.	)	(LEAD DOCKET NUMBER)
NOOR ALAUJAN, <div style="text-align: right;">Defendant.</div>	)	
SONY BMG MUSIC ENTERTAINMENT et al.	)	
	)	Civ. Act. No 07-cv-11446-NG
v.	)	(ORIGINAL DOCKET NUMBER)
JOEL TENENBAUM, <div style="text-align: right;">Defendants.</div>	)	

**PLAINTIFFS’ MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT’S MOTION TO AMEND COMPLAINT, MOTION FOR SUMMARY  
JUDGMENT, AND MOTION TO DISMISS**

Plaintiffs, Capitol Records, Inc. *et al.*, respectfully request an additional twenty days to file their Responses to Defendant’s Motion to Amend Complaint, Motion for Summary Judgment, and Motion to Dismiss. Plaintiffs assert that the following circumstances demonstrate good cause for the above deadlines to be extended as requested:

1. Plaintiffs filed the Complaint against Defendant on August 7, 2007.
2. Defendant was served on August 18, 2007. Defendant filed an Answer on September 1, 2007.
3. On November 23, 2007, Defendant filed a Motion to Amend Complaint, Motion

for Summary Judgment, and Motion to Dismiss (“Motions”).

4. Due to the substantial time required to address the issues in Defendant’s three Motions and the Thanksgiving and Christmas holidays, Plaintiffs require additional time to file Responses to Defendant’s Motions.

5. No party will be prejudiced by this brief extension and no scheduling order has been entered in this case, to date. In addition, the Court has set a January 29, 2008 hearing date and no discovery can proceed before this hearing.

6. Defendant opposes this Motion. While Defendant consented to a seven day extension of time, he was unwilling to consent to any further extension.

WHEREFORE Plaintiffs respectfully request an extension of time, up to and including January 3, 2008, to file a Response to Defendant’s Motion to Amend Complaint, Motion for Summary Judgment, and Motion to Dismiss.

Dated this 11th day of December, 2007.

Respectfully submitted,

/s/ Nancy M. Cremins

---

John R. Bauer, BBO# 630742  
Nancy M. Cremins, BBO # 658932  
ROBINSON & COLE LLP  
One Boston Place  
Boston, MA 02108-4404  
Main Phone: (617) 557-5900  
Main Fax: (617) 557-5999

ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

In addition to filing this motion through the ECF procedure, the undersigned hereby certifies that a true and correct copy of the above and foregoing **MOTION TO EXTEND DEADLINES** was forwarded in accordance with the Federal Rules of Civil Procedure on this 11<sup>th</sup> day of December, 2007, via first class mail as follows:

Joel Tenenbaum 1666 Commonwealth Ave Unit 41 Brighton, MA 02135
--