

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
(EAST ST. LOUIS)

CASE NO.: 3:12-CV-00114-DRH-SCW

ALEX WALKER,)
)
Plaintiff,)
v.)
)
THREE ANGELS BROADCASTING)
NETWORK, INC., and TOMMY SHELTON)
)
Defendants.)
_____)

**PLAINTIFF’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO DEFENDANT
THREE ANGELS BROADCASTING NETWORK, INC.’S MOTION TO DISMISS**

COMES NOW Plaintiff, ALEX WALKER, by and through undersigned counsel, and files this Unopposed Motion for Extension of Time to Respond to Defendant Three Angels Broadcasting Network, Inc.’s, Motion to Dismiss, and states as follows:

1. This action arises from the alleged sexual abuse of Plaintiff Alex Walker by Tommy Shelton while Shelton was employed by Three Angels Broadcasting Network, Inc. (hereinafter “Three Angels”), and occurring, in part, at the Three Angels’ headquarters in Southern Illinois.
2. Defendant Three Angels filed a Motion to Dismiss Plaintiff’s Complaint [DE 30] on February 28, 2012. Pursuant to Local Rules 5.1(c) and 7.1(c), Plaintiff’s Response is due on April 2, 2012.
3. Due to demands on Plaintiff’s counsel in other cases and matters including mediations, discovery and briefing deadlines in Jane Doe v. Lifemark Hospitals, Miami-Dade Circuit Court,

case no. 10-47700 CA 11; John Doe v. Archdiocese of Miami, Inc., Miami-Dade Circuit Court, case no. 10-59917 CA 32; Jane Doe No. 8 v. Royal Caribbean Cruise Lines, U.S. District Court for the Southern District of Florida, case no. 11-CIV-21713-WILLIAMS; and Bryson v. Diocese of Camden, U.S. District Court, District of New Jersey, case no. 1:12-cv-00499, Plaintiff's counsel requires additional time to respond to Three Angels' Motion to Dismiss.

4. Plaintiff's counsel requests a brief, one week extension, up to and including April 9, 2012, to file a Response to Defendant's Motion to Dismiss. This request is made in good faith and not for purposes of undue delay.

5. Plaintiff's counsel has conferred with counsel for Three Angels, who advises he does not object to the relief requested.

6. A proposed order granting the requested relief is attached hereto as Exhibit A.

WHEREFORE, Plaintiff Alex Walker respectfully requests this Court enter an Order granting a one week extension, up to and including April 9, 2012, to file the Response to Three Angels' Motion to Dismiss, and all other such and further relief this Court deems necessary.

Dated: April 2, 2012.

Respectfully submitted,

By: /s/Jessica D. Arbour

Jessica D. Arbour

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(admitted *pro hac vice*)

-and-

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2012, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day to all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/Jessica D. Arbour

