

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ROBERT H. BRAVER, an individual,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: CIV-05-210-T
)	
NEWPORT INTERNET MARKETING)	
CORPORATION, a California corporation, and)	
ROBERT ALAN SOLOWAY, an individual,)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ MOTION TO SET ASIDE DEFAULT JUDGMENT**

Pursuant to LCvR7.2(f), Plaintiff Robert H. Braver, by and through his attorney, Michael R. McKee, moves this Court for the issuance of an order extending his time by ten days to respond to Newport Internet Marketing Corporation and Robert Alan Soloway’s (“Defendants”) Motion to Set Aside Default Judgment (“Motion”). In support thereof, Plaintiff would show the Court as follows:

1. Plaintiff’s answer is currently due on November 7, 2005.
2. Plaintiff has not previously requested an extension of time.
3. Plaintiff and Plaintiff’s counsel needs ten additional days’ time to respond to Defendants’ motion because Plaintiff’s counsel has been out of state for a prior commitment, and Plaintiff has been and is still in the process of obtaining affidavits and other data that he expects will show that Defendants’ premise for filing their Motion is demonstrably false and that defendant Robert Alan Soloway committed perjury by way of the accompanying affidavit.

4. Plaintiff's counsel has conferred with counsel for Defendants, James A. Choate, who has no objection to the requested extension.
5. The requested extension will not impact any deadlines.

WHEREFORE, premises considered, Plaintiff Robert H. Braver prays that this Court issue its order extending his deadline to file a response to Defendants' Motion to Set Aside Default Judgment to November 17, 2005.

Respectfully submitted,

s/Michael R. McKee
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**ATTORNEY FOR PLAINTIFF
ROBERT H. BRAVER**

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2005, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the electronic records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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s/Michael R. McKee
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