

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 15-20782-Civ-MARTINEZ/GOODMAN

DENNIS MONTGOMERY

Plaintiff,

vs.

JAMES RISEN, HOUGHTON MIFFLIN  
HARCOURT PUBLISHING COMPANY  
and HMH HOLDINGS, INC.,

Defendants.

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**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME  
TO RESPOND TO THE COMPLAINT**

Defendants James Risen, Houghton Mifflin Harcourt Publishing Company, and HMH Holdings, Inc. (collectively "Defendants"), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, move for an extension of time, up to and including April 9, 2015, to file their response(s) to Plaintiff's Complaint. The grounds for this Motion are:

1. Houghton Mifflin Harcourt Publishing Company was served with process on February 26, 2015, thus making its response to Plaintiff's Complaint due on March 19, 2015.
2. HMH Holdings, Inc. was served with process on February 27, 2015, thus making its response to Plaintiff's Complaint due on March 20, 2015.
3. James Risen was served with process on March 3, 2015, thus making his response to Plaintiff's Complaint due on March 24, 2015.
4. Due to obligations in other matters, and the number of issues raised in the Complaint, Defendants request an extension of time up to and including April 9, 2015, to prepare and file their response(s) to the Complaint.

5. Counsel for Defendants has conferred with counsel for Plaintiff, who has indicated he has no objection to the requested extension of time.

WHEREFORE, Defendants respectfully request an extension of time, up to and including April 9, 2015, to file their response(s) to Plaintiff's Complaint.

Respectfully submitted,

HOLLAND & KNIGHT LLP  
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s/ Sanford L. Bohrer  
Sanford L. Bohrer (FBN 160643)  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 17th day of March 2015, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System.

s/Sanford L. Bohrer

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