

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TCYK, LLC,)	
)	Case No.: 13-cv-3840
Plaintiff,)	
)	
v.)	Judge Elaine E. Bucklo
)	
DOES 1-113,)	Magistrate Judge Sidney I. Schenkier
)	
Defendants.)	

**PLANTIFF'S MOTION FOR FIRST EXTENSION OF TIME
TO AMEND COMPLAINT**

Plaintiff, TCYK, LLC, moves for entry of an order extending the time for Plaintiff to amend the Complaint to name the actual defendants in this matter, and states:

1. This is an action for copyright infringement of a mainstream, award-winning movie entitled "The Company You Keep" filed against certain Doe defendants known to Plaintiff only by their respective IP addresses. The true identities of the Doe Defendants are known by their respective internet service providers ("ISPs").
2. Plaintiff's motion for leave to take discovery was granted on June 27, 2013, whereupon Plaintiff served each ISP with a third party subpoena demanding that they provide identifying information concerning the Doe defendants.
3. Pursuant to the Court's order of June 27, 2013, Plaintiff must amend the Complaint to name the actual defendants in this matter by August 2, 2013.
4. To date, none of the ISPs have complied with the subpoenas; although Comcast Cable, for example, has stated that a substantive response will be provided by August 29, 2013.

5. Plaintiff respectfully requests that the time for amending the Complaint be extended until at least thirty (30) days after Plaintiff's counsel receives the last of the identifying information from the ISPs, or until October 10, 2013, whichever occurs first.

WHEREFORE, Plaintiff respectfully requests that the time for amending the Complaint in this matter to name the actual defendants be extended to no later than October 10, 2013. A proposed order is being submitted concurrently by email in accordance with the Court's published procedures.

Dated: August 1, 2013

Respectfully submitted,

By: s/ Michael A. Hierl
Michael A. Hierl (Bar No. 3128021)
Todd S. Parkhurst (Bar No. 2145456)
Hughes Socol Piers Resnick & Dym, Ltd.
70 W. Madison Street, Suite 4000
Chicago, Illinois 60602
(312) 580-0100 Telephone
(312) 580-1994 Facsimile
mhierl@hsplegal.com

Attorneys for Plaintiff
TCYK, LLC

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Plaintiff's Motion for First Extension of Time to Amend Complaint was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on August 1, 2013.

s/Michael A. Hierl