

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

PANORAMIC STOCK IMAGES, LTD.,)	
D/B/A PANORAMIC IMAGES,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:22-cv-0097-MTS
)	
WASHINGTON UNIVERSITY)	
IN ST. LOUIS,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S COMPLAINT**

Pursuant to Local Rule 4.01, Defendant Washington University in St. Louis ("Wash U") respectfully requests an additional thirty (30) days, up to and including April 18, 2022, for it to file its response to Plaintiff Panoramic Stock Images, Ltd., d/b/a Panoramic Images’s ("Panoramic") Complaint for Copyright Infringement. In support of this Motion, Wash U states as follows:

1. Panoramic filed its Complaint in this matter on January 25, 2022 (Dkt. No. 1). Wash U was served on January 26, 2022 (Dkt. No. 7).
2. Wash U’s response to the Complaint was due February 16, 2022, but this Court extended that deadline, by consent of the parties, to March 18, 2022 (Dkt No. 11).
3. Since the last request, Wash U’s investigation has continued and the parties have engaged in discussions that could possibly lead to an early resolution of this dispute. Both parties continue to have an open dialogue regarding the case. As a result, Wash U respectfully requests an extension of time, up through and including Monday, April 18, 2022, in which to respond to Panoramic’s Complaint.

4. Wash U has conferred with Panoramic's counsel via e-mail, and Panoramic consents to the extension requested herein.

5. This is Wash U's second request for an extension of time to respond to the Complaint.

6. This Motion is timely and not made for the purpose of delay. No party will be prejudiced by the extension sought herein and there are no other existing deadlines in this matter impacted by the extension sought by Wash U.

WHEREFORE, for the foregoing reasons, Wash U, by and through counsel, respectfully requests that the Court enter an Order granting Wash U an extension of time, through and including April 18, 2022, to file its responsive pleading to Panoramic's Complaint.

Date: March 17, 2022

Respectfully submitted,

STINSON LLP

/s/B. Scott Eidson

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2022, the foregoing was filed using the Court's ECF electronic filing system, which caused a copy to be served on all counsel of record.

/s/ B. Scott Eidson _____
Attorney for Defendant