

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
BRUCE CAMERON DAVIDSON)	
)	
Plaintiff,)	Case No.: 1:24-cv-01836-RDM
v.)	
)	
HOWARD UNIVERSITY)	
)	
Defendant.)	
_____)	

DEFENDANT’S CONSENT MOTION
FOR EXTENSION OF TIME TO FILE ITS RESPONSIVE PLEADING

NOW COMES Defendant Howard University (“Howard” or “Defendant”) by and through undersigned counsel, with the consent of Plaintiff, files this Consent Motion for Extension of Time to File its Responsive Pleading. For the reasons more thoroughly provided in the accompanying Memorandum, and pursuant to Fed. R.s Civ. Pro. 6(b) and 12(a), as well as the Local Rules for the United States District Court for the District of Columbia, Defendant hereby respectfully moves this Court for an extension of time until August 30, 2024 to file its responsive pleading.

July 15, 2024

Respectfully submitted,

HOWARD UNIVERSITY

/s/

Zachary I. Shapiro
Deputy General Counsel
D.C. Bar # 1021639
Nathiya Nagendra
Associate General Counsel
D.C. Bar # 1031055
Howard University
2400 Sixth Street, N.W.

Washington, D.C. 20059
T: 202-806-2664
Email: Zachary.Shapiro@howard.edu

LCvR 7(m) CERTIFICATE OF CONFERENCE

On July 8 and 10, 2024, undersigned contacted counsel for Plaintiff to determine Plaintiff's position on the relief sought by Howard in the instant Motion. On July 10, 2024, counsel for Plaintiff provided their consent for the instant Motion via email.

/s/ _____
Zachary I. Shapiro

CERTIFICATE OF SERVICE

This Motion was filed via ECF/Pacer on July 15, 2024 and thereby served on counsel of record.

/s/ _____
Zachary I. Shapiro

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)	
Defendant.)	
_____)	

**DEFENDANT’S MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF ITS CONSENT MOTION FOR
EXTENSION OF TIME TO FILE ITS RESPONSIVE PLEADING**

Defendant Howard University (“Howard” or “Defendant”) by and through undersigned counsel, with the consent of Plaintiff, hereby requests an extension of time through August 30, 2024 to file its responsive pleading in this matter. In further support, Howard states as follows:

1. On June 25, 2024, Plaintiff filed a Complaint alleging various claims of copyright infringement. (ECF Dkt. #1). The Summons was issued on June 26, 2024. (ECF Dkt. #4).
2. On July 1, 2024 Plaintiff filed an Affidavit of Service, which alleged that Howard was served the Summons on the same date. (ECF Dkt. # 4).
3. If served as alleged, Howard’s responsive pleading would be required to be filed on or before July 22, 2024.
4. Howard is taking steps to further investigate this matter and requires additional time to file its responsive pleading.
5. Additionally, the parties have been in good faith discussions to resolve this matter which may moot Howard’s need to file a responsive pleading.

6. The requested extension would not prejudice either party as this matter is in its nascent stages and was only recently filed.

As such, and for the good cause shown, Defendant respectfully requests an extension until August 30, 2024 to file its responsive pleading.

July 15, 2024

Respectfully submitted,

HOWARD UNIVERSITY

/s/
Zachary I. Shapiro
Deputy General Counsel
D.C. Bar # 1021639
Nathiya Nagendra
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HOWARD UNIVERSITY)	
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Defendant.)	
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ORDER

Upon consideration of Defendant’s Consent Motion for Extension of Time to File its Responsive Pleading, it is this ____ day of _____, 2024 hereby

ORDERED that Defendant’s responsive pleading be filed on or before August 30, 2024.

So Ordered.

The Hon. Randolph D. Moss
U.S. District Judge