

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

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

NOW COMES Defendant Howard University (“Howard” or “Defendant”) by and through undersigned counsel, and with the consent of Plaintiff, files this second 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 October 29, 2024 to file its responsive pleading.

August 26, 2024

Respectfully submitted,

**HOWARD UNIVERSITY**

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

Washington, D.C. 20059  
T: 202-806-2664  
Email: [Zachary.Shapiro@howard.edu](mailto:Zachary.Shapiro@howard.edu)

**LCvR 7(m) CERTIFICATE OF CONFERENCE**

On August 19, 2024, undersigned contacted counsel for Plaintiff to determine Plaintiff's position on the relief sought by Howard in the instant Motion. On August 20, 2024, counsel for Plaintiff provided their consent for the instant Motion via email.

*/s/ Nathiya Nagendra* \_\_\_\_\_

Zachary I. Shapiro

Nathiya Nagendra

**CERTIFICATE OF SERVICE**

This Motion was filed via ECF/Pacer on August 26, 2024 and thereby served on counsel of record.

*/s/ Nathiya Nagendra* \_\_\_\_\_

Nathiya Nagendra

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

**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, and with the consent of Plaintiff, hereby requests an extension of time through October 29, 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. On or about July 16, 2024, with the consent of Plaintiff, Defendant moved for an extension of time to respond to the Complaint through August 30, 2024. (ECF Dkt. #4).
4. By Minute Order dated July 17, 2024, the Court granted Howard’s Consent Motion. (Minute Order, July 17, 2024).
5. Since that time, the parties have continued to work in good faith to bring closure to this matter and anticipate a dismissal with prejudice may be filed.

6. As such, Howard, with the consent of Plaintiff, requests an additional 60 days to respond to the Complaint through October 29, 2024 in the hopes that this matter can be dismissed without further intervention from the Court.
7. 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 October 29, 2024 to file its responsive pleading.

August 26, 2024

Respectfully submitted,

**HOWARD UNIVERSITY**

*/s/ Nathiya Nagendra* \_\_\_\_\_  
Zachary I. Shapiro  
Deputy General Counsel  
D.C. Bar # 1021639  
Nathiya Nagendra  
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<b>Plaintiff,</b>	)	<b>Case No.: 1:24-cv-01836-RDM</b>
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	)	
<b>HOWARD UNIVERSITY</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**ORDER**

Upon consideration of Defendant’s Second 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 October 29, 2024.

So Ordered.

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