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Attorneys for Defendant The Washington Post Company

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

AMERICAN BUDDHA,

Civil No. 06-CV-3054-PA

Plaintiff,

JOINT MOTION FOR EXTENSION OF
TIME

v.

THE CITY OF ASHLAND and THE
WASHINGTON POST COMPANY,

Defendants.

MOTION


On or about August 30, 2006, The Washington Post Company (the "Post") was served with plaintiff American Buddha's Complaint against the City of Ashland and the Post. Plaintiff's investigation of the facts relating to its claim against the Post is continuing, and plaintiff is engaged in discussions with the City of Ashland that may resolve this matter.

For those reasons, American Buddha and the Post respectfully request that the Court enter an order extending the time for the Post to move, answer or otherwise plead in response to

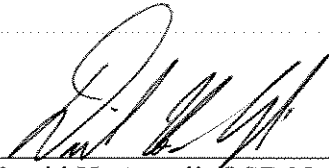
the Complaint through and including October 19, 2006. This motion is made without waiver of the Post's right to raise any defense to the Complaint, including, but not limited to, lack of personal jurisdiction.

Counsel for the Post has conferred with counsel for the City of Ashland, who confirmed that the City of Ashland has no objection to this extension of time.

DATED: September 19, 2006.


for _____
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **JOINT MOTION FOR EXTENSION OF TIME** on the following named persons on the date indicated below by

- mailing with postage prepaid
- hand delivery
- facsimile transmission
- overnight delivery
- Email
- notice of electronic filing using the Cm/ECF system

to said persons a true copy thereof, contained in a sealed envelope, addressed to said persons at their last-known addresses indicated below.

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DATED: September 19, 2006.

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