

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

ILLOOMINATE MEDIA, INC ET AL

Plaintiffs

v.

CAIR FLORIDA, INC., et al

Defendants.

Case Number: 9:19-cv-81179

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO
MAGISTRATE REINHART'S ORDER OF AUGUST 4, 2021 *NUNC PRO TUNC***

Plaintiffs hereby move for leave to file objections to Magistrate Bruce Reinhart's order of August 4, 2021 granting in part and denying in part Defendants' motion for attorneys fees and costs (the "Order") on or before November 30, 2021. This request is being made in light of the U.S. Court of Appeals for the Eleventh Circuit's ("Eleventh Circuit") order of November 9, 2021 dismissing the appeal of Magistrate Reinharts' Order because this Court has not yet entered a final order. Plaintiffs have now prepared these Objections, and they are attached hereto as Exhibit 1, and incorporated herein by reference.

Plaintiffs timely filed a notice of appeal to Magistrate Reinhart's Order on September 1, 2021, as they believed that was the proper procedure given that Magistrate Reinhart has issued an order and not a Report and Recommendation, as magistrate judges often do. Given the Eleventh Circuit's order, there is no prejudice to any party to allow this matter to be fully litigated at this level before then being appealed, if necessary.

Pursuant to the Court's order of November 9, 2021, the undersigned sought consent for this motion from counsel for the Defendants via email on November 10, 2021, asking them to respond by 3:00p.m. EST. Counsel for Defendant CAIR Foundation has indicated that they do

not consent. Counsel for CAIR Florida, Inc. has not responded.

Dated: November 10, 2021

Respectfully Submitted,

/s/ Larry Klayman

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of November, 2021 a true copy of the foregoing was filed via ECF and served to all counsel of record through the Court's ECF system.

/s/ Larry Klayman

CERTIFICATE OF GOOD FAITH CONFERENCE; CONFERRED BUT UNABLE TO RESOLVE ISSUES PRESENTED IN THE MOTION

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with all parties or non-parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issues but has been unable to resolve the issues.

/s/ Larry Klayman