

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 1:23-cv-22933-RKA

WORLD MEDIA ALLIANCE LABEL
INC.,

Plaintiff,

vs.

ELLO ENTERTAINMENT GROUP, LLC,

VAL SEGAL,

YOUTUBE, LLC,

and GOOGLE LLC,

Defendants.

**JOINT MOTION BY PLAINTIFF WORLD MEDIA ALLIANCE LABEL INC. AND
DEFENDANTS YOUTUBE, LLC AND GOOGLE LLC FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff World Media Alliance Label Inc. ("Plaintiff") and Defendants Google LLC ("Google") and YouTube, LLC ("YouTube"), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Southern District of Florida Local Rule 7.1, hereby jointly move this Court for an extension of Google and YouTube's time to respond to Plaintiff's Complaint (D.E. 1), and in support state as follows:

1. Plaintiff filed the Complaint on August 6, 2023.
2. On September 27, 2023, Plaintiff served the Complaint on Google and YouTube.
3. On January 21, 2024, following the parties' January 18, 2024 status conference, the Court issued an order extending Google and YouTube's deadline to respond to the Complaint

until February 26, 2024. D.E. 56. The January 21 Order also directed “Plaintiff to give the Defendants an **itemized list** specifying ALL of the allegedly infringed songs and videos, as well as the associated copyright information, by **February 1, 2024.**” *Id.*

4. Pursuant to the January 21 Order and the Court’s instructions at the January 18 status conference, Plaintiff’s counsel is engaging in good-faith discussions with counsel for the various Defendants, including Defendants Ello and Segal, in an effort to resolve Plaintiff’s claims without the need for further motion practice. No agreement has been reached as of today, though discussions remain ongoing. To accommodate these ongoing discussions, Plaintiff’s counsel agreed to an additional 30-day extension for Google and YouTube to respond to the Complaint, up to and including March 27, 2024.

5. This motion is made in good faith and without the purpose of delay.

WHEREFORE, Google, YouTube, and Plaintiff respectfully request that this Court grant this Agreed Motion and enter the proposed Order attached hereto as Exhibit A, allowing Google and YouTube up to and including March 27, 2024, within which to respond to the Complaint.

Dated: February 21, 2024

Respectfully submitted,

/s/ George Lambert

George Lambert, Esq.
The Lambert Law Firm
FL bar 1022697
421 Poinciana Drive, #1422,
Sunny Isles Beach, FL 33160
Email: office.law.323@gmail.com
Tel. (305) 938 0600

*Attorney for Plaintiff World Media
Alliance Label Inc.*

By: /s/ Jay B. Shapiro

JAY B. SHAPIRO
Florida Bar No. 776361
jshapiro@stearnsweaver.com
VERONICA L. DE ZAYAS
Florida Bar No. 91284
vdezayas@stearnsweaver.com
STEARNS WEAVER MILLER WEISSLER
ALHADEFF & SITTERSON, P.A.
Museum Tower, Suite 2200
150 West Flagler Street
Miami, FL 33130
Telephone: (305) 789-3200
Facsimile: (305) 789-3395

BRIAN WILLEN (*pro hac vice*)

bwillen@wsgr.com

JEREMY AUSTER (*pro hac vice*)

jauster@wsgr.com

WILSON SONSINI GOODRICH & ROSATI
1301 6th Ave, #40
New York, NY 10019

*Attorneys for Defendants YouTube, LLC and
Google LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 21, 2024, the foregoing document was electronically filed and served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Jay B. Shapiro
Jay B. Shapiro