IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 12-61735-Civ-Zloch

BROWARD BULLDOG, INC., a Florida)
corporation not for profit, and DAN)
CHRISTENSEN, founder, operator and editor)
of the BrowardBulldog.com website,)
)
Plaintiffs,)
)
V.)
)
U.S. DEPARTMENT OF JUSTICE,)
950 Pennsylvania Avenue, NW)
Washington, DC 20530, and)
FEDERAL BUREAU OF INVESTIGATION,)
935 Pennsylvania Avenue, NW)
Washington, DC 20535,)
)
Defendants.)
	_)

Plaintiffs' Notification of Ninety Days Expiring

Plaintiffs, Broward Bulldog, Inc., and Dan Christensen, provide notice pursuant to Southern District of Florida Rule 7.1(b)(4) that the following motion has been pending and fully briefed with no hearing set thereon for a period of ninety (90) days:

- (i) <u>Motion</u>. Plaintiff's Motion to Modify Protective Order to Allow Discovery Prior to Ruling on Defendants' Motion for Summary Judgment, **Docket Entry 101**, served and filed on January 11, 2018.
- (ii) <u>Response</u>. Defendants' Opposition to Plaintiffs' Motion to Modify Protective Order to Allow Discovery Prior to Ruling on Defendants' Motion for Summary Judgment, **Docket Entry 103**, served and filed on January 25, 2018
 - (iii) Reply. Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion to

Modify Protective Order, **Docket Entry 104**, served and filed on February 1, 2018.

(iv) <u>Hearing</u>. No hearing on the motion has been set or held.

The ninety days from the completion of briefing expired on Wednesday, May 2, 2018, and this notice is timely because it has been filed within 14 days of that date as required by Southern District of Florida Rule 7.1(b)(4).

Respectfully submitted,

Gunster, Yoakley & Stewart P.A. Attorneys for Broward Bulldog, Inc. and Dan Christensen

By s/ Thomas R. Julin

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and through that filing served:

Dexter Lee Assistant U.S. Attorney 99 N.E. 4th St., Suite 300 Miami, Florida 33132 Dexter.Lee@usdoj.gov 1. 305. 961.9243

> s/ Thomas R. Julin Thomas R. Julin