

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREGORY GREENE, et al.,)	
)	
Plaintiffs,)	Case No. 1:14-cv-01437
)	
v.)	Judge Gary Feinerman
)	
MTGOX INC., et al.,)	
)	
Defendants.)	

**DEFENDANTS MARK KARPELES' AND TIBANNE KK'S
AGREED MOTION FOR EXTENSION OF TIME TO FILE
THEIR MOTION TO DISMISS AND THEIR RESPONSE TO
PLAINTIFFS' MOTION TO APPROVE SERVICE BY ALTERNATIVE MEANS**

Defendants Mark Karpeles (“Karpeles”) and Tibanne KK (“Tibanne”), by their attorneys, Novack and Macey LLP, respectfully move this Court to enter an Order granting Karpeles and Tibanne an additional 14 days -- or through and until May 12, 2014 -- to file their Motion To Dismiss (the “Motion To Dismiss”) and their Response To Plaintiffs’ Motion To Approve Service By Alternative Means (the “Response”). In support, Karpeles and Tibanne state as follows:

1. On March 17, 2014, Plaintiffs filed their 46-page, 238-paragraph *Corrected* First Amended Class Action Complaint (the “Complaint”).
2. On April 4, 2014, counsel for Karpeles and Tibanne filed their appearance in the case.
3. During court proceedings on April 7, 2014, counsel for Karpeles and Tibanne informed the Court and Plaintiffs that they filed their appearance in the case in order to assert Karpeles’ and Tibanne’s defenses of lack of personal jurisdiction and improper service of process.

4. Two events occurred that same day: (1) the Court set a briefing schedule for Karpeles' and Tibanne's Motion To Dismiss pursuant to Rules 12(b)(2), 12(b)(4) and 12(b)(5) of the Federal Rules of Civil Procedure (*see* Dkt. No. 59); and (2) Plaintiffs filed their Motion To Approve Service By Alternative Means (Dkt. No. 54) (the "Motion For Alternative Service"). The Court subsequently ordered Karpeles and Tibanne to respond to the Motion For Alternative Service on or before April 28, 2014. (*See* Dkt. No. 63.)

5. Due to the length of the Complaint and number of issues involved, Karpeles and Tibanne reasonably require additional time to file their Motion To Dismiss and their Response and to assemble the documents in support thereof.

6. Counsel for Plaintiffs agreed to extend the deadline for Karpeles and Tibanne to file their Motion To Dismiss and Response through and until May 12, 2014.

7. This request for an extension of time is not made for any improper purpose and, if allowed, would not result in undue delay or prejudice to any party.

WHEREFORE, Defendants Mark Karpeles and Tibanne KK respectfully request that the Court enter an Order granting them: (a) through and until May 12, 2014 to file their Motion To Dismiss and their Response To Plaintiffs' Motion To Approve Service By Alternative Means; and (b) such other and further relief as is appropriate.

Respectfully submitted,

MARK KARPELES and TIBANNE KK

By: /s/ Eric N. Macey
One Of Their Attorneys

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*Attorneys for Defendants
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CERTIFICATE OF SERVICE

Eric N. Macey, an attorney, hereby certifies that, on April 28, 2014, I caused a true and correct copy of the foregoing *Mark Karpeles' And Tibanne KK's Agreed Motion For Extension Of Time To File Their Motion To Dismiss And Their Response To Plaintiffs' Motion To Approve Service By Alternative Means* to be filed electronically with the Court's CM/ECF system. Notice of this filing was sent to all parties who are registered CM/ECF users by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Eric N. Macey