

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

3D GLOBAL SOLUTIONS, INC.

Plaintiff

vs.

MVM, INC.

Defendant

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Case No. 1:06cv00722(GK)

**DEFENDANT'S MOTION TO CONTINUE STATUS CONFERENCE**

COMES NOW the Defendant, MVM, INC., a California Corporation, by Counsel, and moves this Honorable Court for an Order continuing the Status Conference in the instant matter from March 15, 2007 until May 14, 2007, or to some other date set by the Court, and in support of same states:

1. On or about February 28, 2007, the Defendant, MVM, Inc., retained HERBERT S. ROSENBLUM, ESQUIRE of HERBERT S. ROSENBLUM, P.C. as its new counsel in this matter.

2. The Status Conference is set for March 15, 2007.

3. Counsel for the Defendant herein has contemporaneously filed a Motion with this Court to extend discovery by sixty (60) days, until May 14, 2007.

4. The Plaintiff herein will not be prejudiced by the Court granting a continuance of the Status Conference until May 14, 2007, or some other date.

5. Counsel for the Plaintiff, Athan T. Tsimpedes, Esquire and Douglas B. McFadden and the law firm of McFadden & Shoreman, LLC, have agreed to Defendant's

request for a Status Conference Continuance until May 14, 2007, or some other date as determined by the Court.

WHEREFORE, for the foregoing reasons, your Defendant, MVM, INC., a California Corporation, prays for an Order continuing the Status Conference until May 14, 2007, or some other date as determined by this Court, and for any further relief deemed appropriate.

MVM, INC.  
a California Corporation

By: /s/ Herbert S. Rosenblum, Esquire

HERBERT S. ROSENBLUM, ESQUIRE  
D.C. Bar No. 093351  
Counsel for Defendant  
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P.O. Box 58  
Alexandria, Virginia 22313-0058  
Telephone: 703/684-0060  
Facsimile: 703/684-0072

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of March 2007, I sent a true copy by First Class, Postage Pre-paid Mail of the foregoing Defendant's Motion to Continue Status Conference to the following: Athan T. Tsimpedes, Esquire, 1420 New York Avenue, 7<sup>th</sup> Floor, Washington, DC 20005, and Douglas B. McFadden, Esquire, McFadden & Shoreman, LLC, 1420 New York Avenue, N.W., Suite 700, Washington, DC 20005.

/S/  
HERBERT S. ROSENBLUM, ESQUIRE