

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: OUTSIDE WALL TIRE
LITIGATION

Case No. 1:09-CV-1217-TSE-IDD

**JUDGMENT CREDITORS' CONSENT MOTION
TO CONTINUE THE DECEMBER 13, 2013 HEARING**

Plaintiffs' Tire Engineering & Distribution, LLC, Bearcat ARL LLC, Beatco A.R.L., Inc. and Jordan Fishman (collectively, "Judgment Creditors"), by and through their undersigned attorneys, hereby submit this Consent Motion to Continue the December 13, 2013 hearing regarding Judgment Creditors' Motion to Determine Value of Gilbert LLP's Lien for Attorney's Fees and Costs ("Motion to Determine Value of Lien") while the parties attempt to resolve this dispute outside of Court. The grounds for this motion are set forth in the accompanying memorandum.

WHEREFORE, the Plaintiffs' respectfully request that this Court grant Judgment Creditors' Consent Motion to Continue the December 13, 2013 Hearing. A proposed Order is attached.

Dated: December 2, 2013

Respectfully Submitted,

By: _____/s/_____
William E. Copley
Virginia Bar No. 43960
August J. Matteis (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I, William E. Copley, certify that on December 2, 2013, I caused a true and accurate copy of the foregoing Judgment Creditors' Consent Motion to Continue the December 13, 2013 Hearing to be filed electronically with the Clerk of the Court and also to be served on all parties on December 2, 2013 via the Court's CM/ECF system. In addition, I caused a true and accurate copy of the foregoing to be served by electronic mail upon counsel for Gilbert LLP at the below address:

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By: _____ /s/
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