

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
OWENSBORO DIVISION

FORBA HOLDINGS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:08-cv-00137-JHM-ERG
	)	
DEBBIE HAGAN,	)	
	)	
Defendant.	)	

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANT’S MOTION FOR  
EXTENSION OF TIME**

Plaintiff, now known as Church Street Health Management, LLC,<sup>1</sup> respectfully opposes the motion for an extension of time [Docket No. 43] to respond to Plaintiff’s (a) Motion for Sanctions, to Enforce Consent Injunction, to Show Cause as to Why Defendant Should Not Be Held in Contempt, to Hold Defendant in Contempt, for Award of Attorney’s Fees, the Imposition of Fines and Other Relief (“Motion for Sanctions”) [Docket No. 40] and (b) Motion for Hearing on Motion for Sanctions [Docket No. 41].

As grounds for this response in opposition, Plaintiff states as follows:

1. The matters addressed in the Motion for Sanctions are straightforward and there is no need for any extension of time, much less an extension of 45 days.
2. Since the date Defendant admits to receiving Plaintiff’s motion papers, July 9, 2011, Defendant has altered the postings on her “Dentist the Menace” blog at least 16 times, including at least five times since the accident of her husband, care for whom she claims is

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<sup>1</sup> FORBA Holdings, LLC changed its name to Church Street Health Management, LLC effective December 31, 2010.

preventing her from responding to the Motion for Sanctions. See Exhibit A hereto, a summary of notices from a service that tracks changes made to Plaintiff's "Dentist the Menace" blog. Defendant has also made at least four Facebook postings in that time span. See Exhibit B, Defendant's "Dentist the Menace" Facebook page. And Defendant has found just as much time to tend to her Twitter account, making another four postings on Twitter during the same period. See Exhibit C, Defendant's most recent Twitter postings.

3. If Defendant has time to continue to post blog, Facebook and Twitter entries about Plaintiff, she has time to respond to Plaintiff's Motion for Sanctions and appear before this Court for a hearing on Plaintiff's Motion for Sanctions.

Respectfully submitted,

/s/ Thor Y. Urness

Thor Y. Urness (admitted *pro hac vice*)  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Plaintiff's Response in Opposition to Defendant's Motion for Extension of Time is being served, via U.S. Mail, first class postage prepaid, on this the 29th day of July, 2011, on:

Debbie Hagan  
4453 Strickland Drive  
Owensboro, KY 42301-6519

/s/ Thor Y. Urness

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Thor Y. Urness