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9 UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
10 SACRAMENTO DIVISION

11 DANIEL JURIN, an Individual,  
12 Plaintiff,  
13 vs.  
14 GOOGLE, INC.,  
15 Defendant.

CASE NO. 2:09-cv-03065-MCE-KJM

**GOOGLE INC.'S *EX PARTE*  
APPLICATION FOR EXTENSION OF  
TIME TO RESPOND TO THE  
COMPLAINT**

17 Pursuant to Civil L.R. 6-144, Defendant Google Inc. ("Google") respectfully requests an  
18 extension of time of 30 days until December 30, 2009 by which to respond to the complaint of  
19 Plaintiff Daniel Jurin ("Jurin"). As is demonstrated in the accompanying Declaration of Margret  
20 M. Caruso, good cause exists for Google's request for an extension of time.

21 This is Google's first request for an extension of time in this action. The complaint was  
22 served on November 10, 2009. Declaration of Margret M. Caruso, dated Nov. 23, 2009, ¶ 3.  
23 Google's response to the complaint is currently due on November 30, 2009. *Id.* at ¶ 4. Google  
24 plans to file a Motion to Dismiss under Rule 12(b)(6) and a Motion for Costs under Rule 41(d)  
25 and requests an extension of time to prepare the motions and to account for the personal,  
26 Thanksgiving-related plans of the attorneys working on this matter. *Id.* at ¶ 5. Jurin has refused  
27 Google's request for an extension. *Id.* at ¶ 6.  
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16 Defendants.  
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CASE NO. 2:09-cv-03065-MCE-KJM

**[PROPOSED] ORDER EXTENDING  
GOOGLE INC.'S TIME TO RESPOND  
TO THE INITIAL COMPLAINT**

18  
19 **[PROPOSED] ORDER**

20 Upon consideration of the *ex parte* application submitted in this matter, Google's request  
21 to extend its time to answer or otherwise respond to the initial complaint by 30 days to December  
22 30, 2009 is hereby GRANTED.

23  
24 DATED: \_\_\_\_\_, 2009

25  
26 By \_\_\_\_\_

27 UNITED STATES DISTRICT JUDGE