

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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AGENCE FRANCE PRESSE,	:	
	:	
Plaintiff/Counter Defendant,	:	
	:	
v.	:	CASE NUMBER 1:05CV00546 (GK)
	:	
GOOGLE INC.,	:	Next Due Date: March 21, 2006 (Status
	:	Conference)
Defendant/Counter Claimant.	:	
	:	
	:	
	:	
	:	
-----X	:	

JOINT MOTION FOR MODIFICATION OF SCHEDULING ORDER

Plaintiff/Counter Defendant Agence France Press (“AFP”) and Defendant/Counter Claimant Google Inc. (“Google”) hereby jointly move the Court for a modification of certain dates set forth in the Court’s Scheduling Order dated June 20, 2005. More specifically, the parties request that the Court extend the deadlines for Rule 26(a)(2) statements so that Proponent’s Rule 26(a)(2) Statements, which are currently due December 1, 2005, would be due January 16, 2006, and Opponent’s Rule 26(a)(2) Statements, which are currently due February 1, 2006, would be due March 16, 2006.

There is good cause for the requested extension. First, the extension would allow the parties to complete certain discovery before serving Rule 26(a)(2) Statements. Second, the parties are in serious and active negotiation to streamline the issues in this case. There has been no prior request for modification of the Scheduling Order.

A proposed Order is attached.

Respectfully submitted,

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November 21, 2005

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ORDER MODIFYING SCHEDULING ORDER

Upon Joint Motion of the Parties and for good cause shown, the Court's Scheduling Order dated June 20, 2005 is hereby modified as follows:

1. Proponent's Rule 26(a)(2) Statements are due January 16, 2006,
2. Opponent's Rule 26(a)(2) Statements are due March 16, 2006.

United States District Judge

Date: _____