

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

AGENCE FRANCE PRESSE,	:	
	:	
Plaintiff and Counter Defendant,	:	
	:	
v.	:	Civil Action No.: 1:05CV00546 (GK)
	:	
GOOGLE, INC.,	:	
	:	
Defendant and Counter Claimant.	:	
	:	

**CONSENT MOTION TO EXTEND DISCOVERY DEADLINE AND  
CONDUCT TELEPHONIC STATUS REPORT**

**COME NOW**, Agence France Presse and Google Inc. and jointly move the Court to (1) extend the present discovery deadline for another 30 days, and (2) consider instead a brief status report by telephone or in chambers in lieu of the conference present set for March 19.

1. The parties have been pursuing discovery diligently, answering interrogatories, producing documents and expert reports, and taking depositions. They agree that the present discovery deadline of March 27 should be extended by another 30 days to April 27.

2. The parties had hoped to report to the Court in chambers on March 8 concerning confidential items. They jointly suggest an informal telephonic report would be appropriate during the next week if the Court had five minutes available. It is likely that report would lead the Court to defer the March 19 conference.

Respectfully submitted,

/s/

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