IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

KLEIN & HEUCHAN, INC.,

      Plaintiff,

      v.

COSTAR REALTY INFORMATION, INC.,
and COSTAR GROUP, INC.,

      *Defendants-Counterclaim
      Plaintiffs,*

      v.

SCOTT BELL and KLEIN & HEUCHAN,
INC.,

      Counterclaim-Defendants.

Civil Action No. 8:08-cv-01227-JSM-EAJ

JOINT MOTION TO EXTEND DISCOVERY

Defendants/Counterclaim Plaintiffs CoStar Realty Information, Inc., and CoStar Group,

Inc. (collectively, "CoStar") and Counterclaim-Defendant Scott Bell hereby move to extend the

discovery period by a period of 60 days, to July 27, 2009, so as to allow the parties to complete

discovery in this case.[1] Mr. Bell was added to this case subsequent to the initial filing of this

matter, and was not required to file an answer until April 13, 2009. Accordingly, discovery has

just begun with respect to Mr. Bell, and he requires additional time to obtain discovery. In

addition, the other parties need to obtain discovery from Mr. Bell. Further, both CoStar and

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[1] CoStar notes that it has filed a notice regarding related proceeding Case No. 8:09-cv-565-VMC-TGW (*CoStar Realty Information, Inc., et al. v. Klein & Heuchan, Inc., et al.*) contemporaneously herewith.

1

K&H are engaged in ongoing meet and confer discussions regarding pending discovery requests and responses to the same. CoStar must still take the deposition of K&H, and K&H has not yet taken the deposition of CoStar. The requested extension will not change the date for dispositive motions or trial, and given the procedural status of the proceeding, no party will be prejudiced by this short extension that will allow the parties to complete discovery.

LOCAL RULE 3.01(g) CERTIFICATION

Counsel for CoStar certifies that it has conferred with counsel for Mr. Bell regarding the issues raised by this motion, and that counsel for Mr. Bell agreed to the filing of this motion. Counsel for CoStar further certifies that it has conferred with counsel for K&H regarding the issues raised by this motion, but that counsel for CoStar and K&H could not come to an agreement.

Dated: May 28, 2009

Respectfully submitted,

s/William J. Sauers
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- and -

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*Counsel for Defendants-Counterclaim Plaintiffs
CoStar Realty Information, Inc. and CoStar Group,
Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 28, 2009, I electronically filed the foregoing with

the Clerk of the Court by using the CM/ECF system which sent a notice of electronic filing to the

following:

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Attorney for Defendant Scott Bell

I FURTHER CERTIFY that that on May 28, 2009, I sent a true and correct copy of the

foregoing by electronic mail to:

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