

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 06-60905-CIV-ALTONAGA/Turnoff

F & G RESEARCH, INC.,

Plaintiff,

vs.

GOOGLE INC.,

Defendant.

**PLAINTIFF’S MOTION FOR EXTENSION TO RESPOND TO
DEFENDANT’S MOTION FOR RECONSIDERATION OR IN THE ALTERNATIVE,
FOR SUMMARY JUDGMENT ON THE ISSUE OF DIRECT INFRINGEMENT**

Plaintiff, F & G Research, Inc. (“F&G”), by and through its undersigned counsel, respectfully moves this Court for an extension of time to respond to Defendant Google, Inc.’s (“Google”) Motion for Reconsideration or in the Alternative, for Summary Judgment on the Issue of Direct Infringement, and in support states as follows:

The parties jointly moved this Court on June 21, 2007, for an extension of time for F&G to respond to Google’s Motion for Reconsideration or in the alternative, Motion for summary Judgment on the issue of Direct Infringement [“D.E. 77 & 78”] for the purpose of allowing F&G to take the deposition of Brian McClendon on July 13, 2007.

The Court entered an order granting that Motion, giving F&G up to and including July 27, 2007 to respond to Google’s Motion [D.E. 77 & 78].

The deposition of Brian McClendon did go on as scheduled on July 13, 2007, however, F&G has propounded additional follow-up discovery requests to Defendant on July 16th and 17th,

attached hereto as Exhibit A - C.

The responses to these discovery requests are crucial and necessary to the preparation of F&G's response to Google's Motion [D.E. 77 & 78]. Google's responses to the discovery requests fall due on August 16th and 17th.

F&G is therefore respectfully requesting this Court extend the July 27th deadline to August 27th, which will give F&G ample time to review the discovery responses and prepare and file its response to Google's Motion [D.E. 77 & 78].

In accordance with the Local Rules of this Court, the undersigned certifies that he has conferred with counsel for Google and Google is not in agreement with the extension of time being requested.

WHEREFORE, Plaintiff prays this Court grant the instant motion allowing F&G to file its response to Google's Motion [D.E. 77 & 78] on or before August 27, 2007.

Respectfully submitted,

ALLEN D. BRUFISKY, PA

Dated: July 20, 2007

By: s/ Allen D. Brufsky
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th, day of July, 2007, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which will send notification of such filing to the following counsel of record: **Gregory Hillyer and Ramsey Al-Salam**, and I certify that I have mailed the foregoing document to the following parties or counsel of record who are non-CM/ECF participants: NONE.

s/ Allen D. Brufsky
Allen D. Brufsky, Esq.