

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

**MOTOROLA MOBILITY, INC.'S AND MOTOROLA SOLUTIONS, INC.'S (f/k/a
MOTOROLA, INC.) UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO
FILE OPPOSITION TO APPLE INC.'S MOTION TO TRANSFER VENUE**

Motorola Mobility, Inc. and Motorola Solutions, Inc. (f/k/a Motorola, Inc.) (collectively, "Motorola"), pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1, file this unopposed motion for an enlargement of time up to and including February 3, 2011, to file an opposition to Apple Inc.'s ("Apple's") Motion to Transfer Venue. [DE37].

Good cause exists for the granting of the relief requested:

1. Motorola's Opposition is due on or before January 31, 2011. Apple's Reply is due on or before February 10, 2011.

2. Extenuating circumstances exist which necessitate the enlargement of time sought herein. As an initial matter, Motorola believes the enlargement would serve the interests of justice by providing it with the opportunity to adequately investigate the pertinent facts and applicable law, and to determine how to appropriately respond to Apple's motion. Additionally, potential declarants for Motorola are currently out of the country but scheduled to return in time, should the enlargement be provided. Additionally, undersigned counsel has other pre-existing commitments that necessitate an extension of time, including providing initial discovery responses in this matter.

3. This request is not made for purposes of delay, but to conserve the resources of the parties and the Court, and to give Motorola time to adequately investigate the pertinent facts and applicable law, and to determine how to appropriately respond to Apple's motion.

4. Indeed, the undersigned has been informed by counsel for Apple that it does not oppose the requested enlargement.

5. A proposed order consistent with this motion is attached.

WHEREFORE, Motorola respectfully request that the Court enter an order granting an enlargement of time up to and including February 3, 2011, to file the foregoing.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(3)

In accordance with S.D. Fla. Local Rule 7.1(a)(3), undersigned counsel for Motorola certifies that they conferred with counsel for Apple regarding the relief requested herein, who indicated they do not oppose the relief requested herein.

/s Edward M. Mullins
Edward M. Mullins

Dated: January 31, 2011

Respectfully submitted,

/s/ Mark D. Baker

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*Attorneys for Motorola Mobility, Inc. and
Motorola Solutions, Inc. (f/k/a Motorola, Inc.)*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2011, I served the foregoing document via electronic mail on all counsel of record identified on the attached Service List.

/s/ Mark D. Baker

Mark D. Baker

SERVICE LIST
Motorola Mobility, Inc. versus Apple Inc.
Case No. 1:10cv023580-Civ-UU
United States District Court, Southern District of Florida

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