

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CAMBRIDGE UNIVERSITY	§	
PRESS, <i>et al.</i> ,	§	
Plaintiffs,	§	
v.	§	Case No. 1:08-CV-1425-ODE
MARK P. BECKER, in his official	§	
capacity as Georgia State University	§	
President, <i>et al.</i> ,	§	
Defendants.	§	
	§	
	§	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PLAINTIFFS' MOTION TO EXCLUDE THE PUTATIVE
EXPERT TESTIMONY OF KENNETH D. CREWS,
AND MEMORANDUM IN SUPPORT**

Defendants Mark P. Becker, Ron Henry, Nancy Seamans, J.L. Albert, Kenneth R. Bemar1' Jr. , James A. Bishop, Hugh A. Carter, Jr. , William H. Cleveland, Robert F. Hatcher, Felton Jenkins, W. Mansfield Jennings, Jr., James R. Jolly, Donald M. Leebem, Jr., Elridge McMillan, William NeSmith, Jr., Doreen Stiles Poitevint, Willis J. Potts, Jr., Wanda Yancey Rodwell, Kessel Stelling, Jr., Benjamin J. Tarbutton, III, Richard L. Tucker, and Allan Vigil (collectively “Defendants”), pursuant to Federal Rule of Civil Procedure 6(b), respectfully request a fourteen (14) day extension of time for Defendants to move, plead, or

otherwise respond to Plaintiffs' Motion to Exclude the Putative Expert Testimony of Kenneth D. Crews (the "Motion") (Doc. No. 202).

Defendants received a copy of Plaintiffs' Motion on April 13, 2010. Under the local rules of this Court, Defendants must respond to the Motion within fourteen (14) days -- on or before April 27, 2010. *See* L.R. 7.1B. This fourteen-day period overlaps with Defendants' work on their Reply brief in support of their Motion for Summary Judgment (due to this Court on Monday, April 26, 2010). Although Defendants believe that the Motion is unjustified, Defendants are compelled to respond in detail to the Motion to avoid any risk of a decision by this Court to grant the Motion. Because of the timing of the Motion, Defendants believe a fourteen (14) day extension will allow for a thorough investigation and detailed response from Defendants.

Prior to filing this motion for extension of time, Defendants requested consent from counsel for Plaintiffs. Counsel indicated that they would not consent to the requested period of fourteen (14) days for the extension and instead indicated that they would only consent to a three (3) day extension. Defendants believe that a three (3) day extension will not provide a sufficient amount of time for an adequate response to the Motion.

Accordingly, Defendants respectfully move this Court for an extension of time to and including May 11, 2010 within which Defendants may move, plead, or otherwise respond to the Motion. For the Court's convenience, a Proposed Order Extending Time is attached hereto as Exhibit A.

Respectfully submitted this 23rd day of April, 2010.

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Attorneys for Defendants

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to L.R. 5.1B and 7.1D of the Northern District of Georgia, that the foregoing Defendants' Motion for Extension of Time to File Response to Plaintiffs' Motion to Exclude the Putative Expert Testimony of Kenneth D. Crews, and Memorandum in Support complies with the font and point selections approved by the Court in L.R. 5.1B. The foregoing pleading was prepared on a computer using 14-point Times New Roman font.

/s/ C. Suzanne Johnson

C. Suzanne Johnson
Georgia Bar No. 321398

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capacity as Georgia State University	§	
President, <i>et al.</i> ,	§	
Defendants.	§	
	§	
	§	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 23rd day of April, 2010, I have electronically filed the foregoing Defendants' Motion for Extension of Time to File Response to Plaintiffs' Motion to Exclude the Putative Expert Testimony of Kenneth D. Crews, and Memorandum in Support with the Clerk of the Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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