

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

CAMBRIDGE UNIVERSITY PRESS,
et al.,

Plaintiffs,

-vs.-

MARK P. BECKER, in his official
capacity as Georgia State University
President, et al.,

Defendants.

Civil Action File
No.1:08-CV-1425-ODE

DRAFT

**JOINT MOTION FOR EXTENSION OF TIME FOR JOINT FILING OF
ALLEGED INFRINGEMENTS AND PRE-TRIAL ORDER**

Plaintiffs Cambridge University Press, Oxford University Press, Inc., and Sage Publications, Inc. (collectively “Plaintiffs”) and Defendants Mark P. Becker, Ron Henry, Nancy Seamans, J.L. Albert, Kenneth R. Bernard, 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. Leebern, 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”), by and through their undersigned counsel, respectfully move the Court for an approximately thirty (30) day extension of the current deadlines for the parties’ joint filing of alleged

infringements and the Pre-Trial order. In support of this motion, the Parties show the Court as follows:

1.

On November 5, 2010, the Court entered a Scheduling Order in this case in which the parties were given a period of 45 days from November 30, 2010 to complete depositions of up to five GSU witnesses; 45 days from the completion of those depositions to submit a joint filing detailing alleged infringements at GSU during the 2009 Maymester, Summer 2009 term, and Fall 2009 term; and 30 days from the joint filing of alleged infringements to file the Pre-Trial Order.

2.

Plaintiffs noticed the depositions of five GSU professors for January 13-15, 2011. However, given the holiday season and year-end semester break at GSU, the travel and teaching schedules of the professors noticed for depositions, and delays in obtaining and producing certain discovery materials, the parties mutually agreed to conduct the depositions on February 2-4, 2011.

3.

In light of the delay in completing depositions, the parties' ongoing attempt to resolve certain additional discovery issues, and the need for sufficient time to allow the parties to collaborate on the both joint filing of alleged infringements and various aspects of the Pre-Trial Order (including factual stipulations and exhibit

lists), the parties hereby request the Court to extend the deadline for the joint filing of alleged infringements to April 1, 2011, and the deadline for the Pre-Trial order to April 29, 2011.

A Proposed Order is attached for the Court's convenience.

Respectfully submitted this 2nd day of March 2011.

/s/ Anthony B. Askew
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CERTIFICATE OF COMPLIANCE

I hereby certify that this document was prepared in Times New Roman 14 point font.

/s/ Kristen A. Swift
Kristen A. Swift

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing **JOINT MOTION FOR EXTENSION OF TIME FOR JOINT FILING OF ALLEGED INFRINGEMENTS AND PRE-TRIAL ORDER** with the Clerk of Court using the CM/ECF filing system which will automatically send e-mail notification of such filing to the following attorneys of record:

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This 2nd day of March, 2011.

/s/ Kristen A. Swift
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