

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

JAMES BARA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO.:
	)	1:09-cv-03002-CAM-AJB
GOOGLE, INC.,	)	
	)	
Defendant.	)	
	)	

**JOINT MOTION TO EXTEND THE DEADLINE  
FOR DEFENDANT TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF’S COMPLAINT**

Plaintiff James Bara (“Plaintiff”) and Defendant Google, Inc. (“Defendant”)<sup>1</sup> submit this Joint Motion to Extend the Deadline for Defendant to Answer or Otherwise Respond to Plaintiff’s Complaint, which was filed on or about October 29, 2009. The deadline for Defendant to answer or otherwise respond to Plaintiff’s Complaint currently is November 18, 2009. Plaintiff and Defendant respectfully request that Defendant’s deadline be extended through and including December 2, 2009.

<sup>1</sup> Defendant appears specially without waiving any jurisdictional or venue defenses and without consenting to jurisdiction or venue in this Court. Defendant further appears without waiving its contractual right to arbitration and to seek to compel same if necessary.

A proposed Order is attached as Exhibit "A."

Respectfully submitted, this 13th day of November, 2009.

**/s/ Christine K. Van Berkum**

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that, pursuant to Local Rule 7.1D, the foregoing **JOINT MOTION TO EXTEND THE DEADLINE FOR DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** has been prepared in Times New Roman, 14-point font, in conformance with Local Rule 5.1C.

**/s/ Daniel E. Turner**  
**Counsel for Defendant**

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	)	
Defendant.	)	
	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of November 2009, I electronically filed this **JOINT MOTION TO EXTEND THE DEADLINE FOR DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to the following counsel of record:

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/s/ Daniel E. Turner  
Counsel for Defendant