

**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.)	
)	

**SECOND 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”)¹ submit this Second 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 December 2, 2009.² Plaintiff and Defendant

¹ 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.

² The Court previously extended the deadline for Defendant to answer or otherwise respond in its November 16, 2009 Order.

respectfully request that Defendant's deadline be extended through and including December 16, 2009.

A proposed Order is attached as Exhibit "A."

Respectfully submitted, this 25th 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 **SECOND 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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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of November 2009, I electronically filed this **SECOND 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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