

**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. |) | |
| |) | |

**THIRD 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 Third 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 16, 2009.²

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 and November 25, 2009 Orders.

Plaintiff intends to dismiss his Complaint and to pursue his claims in arbitration. Accordingly, Plaintiff and Defendant respectfully request that Defendant's deadline be extended through and including January 6, 2010.

A proposed Order is attached as Exhibit "A."

Respectfully submitted, this 10th day of December, 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 **THIRD 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 10th day of December 2009, I electronically filed this **THIRD 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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Counsel for Defendant