

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LIMITNONE LLC,)	
)	Case No. 08-cv-04178
Plaintiff,)	
)	
vs.)	
)	Hon. Blanche M. Manning
GOOGLE INC.,)	
)	
Defendant.)	

**DEFENDANT GOOGLE INC.'S MOTION
TO EXTEND THE RESPONSIVE PLEADING DEADLINE**

Defendant Google Inc. ("Google"), by and through its attorneys, hereby moves this Honorable Court to extend Google's deadline for responding to LimitNone, LLC's ("LimitNone") Complaint to twenty (20) days after service of the docketing notice by the clerk for the United States District Court for the Northern District of California. In support of its Motion, Google states as follows:

1. On September 22, 2008, the Court granted Google's Motion to Dismiss or, in the Alternative, to Transfer Venue, ordering that this action be transferred to the United States District Court for the Northern District of California pursuant to Northern District of Illinois Local Rule 83.4. (Docket No. 45).

2. In light of the potential uncertainty surrounding the exact date upon which this action will be transferred to and docketed in the Northern District of California, on September 26, 2008 Google attempted to obtain a stipulation with LimitNone to set a date certain upon which Google's responsive pleading would be due. That same day, Google's counsel sent LimitNone's counsel a draft stipulation for review and signature.

3. On September 29, 2008 LimitNone's counsel informed Google that if this Court elected "not [to] stay the transfer, then we can enter the stipulation as we are fine with the concept." Nevertheless, despite several follow-up communications from Google's counsel, LimitNone's counsel has declined to execute and return Google's draft stipulation.

4. Google has made no previous application for similar relief, and Google submits that this Motion is not made for purposes of delay or to otherwise prejudice LimitNone's claims. Rather, this Motion is made to settle any uncertainty that may exist as to pleading deadlines, in light of the imminent transfer of this action. LimitNone's counsel has expressed no opposition to Google's request.

WHEREFORE, for the forgoing reasons, Defendant Google respectfully requests that the Court enter an order setting Google's deadline to file and serve its response to LimitNone's Complaint for twenty (20) days after service of the docketing notice by the clerk for the United States District Court for the Northern District of California.

DATED: October 2, 2008

Respectfully submitted,
GOOGLE INC.

By: /s/ Rachel M. Herrick
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, Rachel M. Herrick, an attorney, certify under penalty of perjury that I caused a copy of the forgoing document to be served on all counsel of record via the Court's CM/ECF online filing system this 2nd day of October, 2008.

/s/ Rachel M. Herrick
Rachel M. Herrick