

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

TIMELINES, INC.	)	
	)	
Plaintiff,	)	Civil Action No.: 11 CV 6867
	)	
v.	)	HONORABLE JOHN W. DARRAH
	)	
FACEBOOK, INC.	)	Jury Trial Demanded
	)	
Defendant.	)	

**TIMELINES, INC.'s MOTION FOR LEAVE TO FILE ADDITIONAL FACTS  
IN ITS LOCAL RULE 56.1(b)(3)(C) STATEMENT OF ADDITIONAL FACTS IN  
OPPOSITION TO FACEBOOK, INC.'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Timelines, Inc., through its attorneys, Reed Smith LLP, moves this Court for leave to file additional facts to its Local Rule 56.1(b)(3)(C) Statement of Additional Facts in opposition to Defendant Facebook, Inc.'s Motion for Summary Judgment for the reasons set forth in its accompanying Memorandum of Law.

Dated: February 22, 2013

Respectfully submitted,

**TIMELINES, INC.,**  
*Plaintiff/Counter-Defendant*

By: /s/ Douglas A. Albritton  
James T. Hultquist (SBN 6204320)  
Douglas A. Albritton (SBN 6228734)  
Michael L. DeMarino (SBN 6298337)  
Bruce R. Van Baren (SBN 6310375)  
REED SMITH LLP  
10 South Wacker Drive  
Chicago, IL 60606-7507  
312-207-1000

*Counsel for TIMELINES, INC.*

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, certify that I electronically filed **TIMELINES, INC.'S MOTION FOR LEAVE TO FILE ADDITIONAL FACTS IN ITS LOCAL RULE 56.1(b)(3)(C) STATEMENT OF ADDITIONAL FACTS IN OPPOSITION TO FACEBOOK, INC.'S MOTION FOR SUMMARY JUDGMENT**. Pursuant to Rule 5(b)(3) of the Federal Rules of Civil Procedure and Local Rule 5.9, I have thereby electronically served all Filing Users.

February 22, 2013

Respectfully submitted,

**TIMELINES, INC.,**  
*Plaintiff/Counter-Defendant*

By: /s/ Douglas A. Albritton  
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Bruce R. Van Baren (SBN 6310375)  
REED SMITH LLP  
10 South Wacker Drive  
Chicago, IL 60606-7507  
Telephone: +1 312 207 1000  
Facsimile: +1 312 207 6400

*Counsel for TIMELINES, INC.*

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