

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

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

**AGREED MOTION TO AMEND THE SCHEDULE ENTERED BY THE COURT
ON MARCH 13, 2013 AND TO EXTEND THE DEADLINES FOR
FILING MOTIONS IN LIMINE AND RESPONSES THERETO**

Plaintiff/Counter-Defendant Timelines, Inc. (“Timelines”) and Defendant/Counter-Plaintiff Facebook, Inc. (“Facebook”), being in agreement, hereby respectfully move the Court to amend the schedule set forth in the Minute Order (Docket Entry # 113) and to extend the deadlines for filing motions in limine and responses thereto. In support of this Agreed Motion, the parties state as follows:

1. While both parties are busy preparing for trial, attorneys for Timelines have had trials and disputes in other matters that just resolved in the prior few days. Additionally, counsel for both parties have been discussing stipulations in an effort to narrow the number of motions in limine to be filed with the Court.

2. Although the Court’s standing pre-trial order did not set a due date for the filings of motions in limine, the parties had proposed a schedule whereby motions in limine would be filed today, April 5, 2013, with responses due on April 12, 2013.

3. Due to the aforementioned scheduling conflicts, the parties are, by this motion, seeking to amend the schedule entered by the Court on March 13, 2013, by one day, as follows:

the deadline for filing motions in limine is extended from April 5, 2013, until April 8, 2013; the deadline for filing answers to any motions in limine is extended from April 12, 2013 until April 15, 2013.

4. This request is made in good faith and not for the purpose of delay and neither party will suffer harm or prejudice upon the granting of this Motion.

WHEREFORE, Plaintiff/Counter-Defendant Timelines, Inc. and Defendant/Counter-Plaintiff Facebook, Inc. respectfully request that this Court enter an order extending the deadlines to file motions in limine and responses thereto; and for such other and further relief as this Court deems as just and proper.

TIMELINES, INC.

By: /s/ Bruce R. Van Baren
One of its Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he served the foregoing Agreed Motion for Extension to Amend the Schedule Entered by the Court on March 13, 2013 and to Extend the Deadlines for Filing Motions in Limine and Responses Thereto by means of the Court's CM/ECF System, which causes a true and correct copy of the same to be served electronically on all CM/ECF registered counsel of record, on April 5, 2013.

/s/ Bruce R. Van Baren
Bruce R. Van Baren