

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

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

**AGREED MOTION TO MOVE INITIAL  
STATUS DATE AND DATES FOR FRCP 26(f) CONFERENCE**

The Parties jointly request that the Court reschedule the Initial Status Conference (presently set in this matter for December 6, 2011 at 9:30 a.m.), to a date during the week of either December 19, 2011 or December 26, 2011. In support of this motion, the Parties explain as follows.

**Basis for Agreed Motion**

Defendant Facebook, Inc. (“Facebook”) agreed to waive formal service of the summons and complaint, and accordingly its response to the Amended Complaint is due on or before Tuesday, December 6, 2011. This presently is the same date as the Initial Status Conference.

By operation of Rule 26(f), the Parties were to confer as soon as practicable, but at least 21 days before the Initial Status Conference, to discuss the various matters set forth in FRCP 26(f) (including discovery matters), and to thereafter prepare a joint discovery plan.

Because Facebook’s response is not yet due, the Parties’ ability to complete the Rule 26(f) conference and plan is limited because, *inter alia*, Timelines has not been able to see Facebook’s response to consider what discovery issues, if any, it might present.

Accordingly, the Parties respectfully submit that if the Court grants this motion and moves the Initial Status Conference to a date during the third or fourth weeks of December, that Facebook will still file its response when due (on or before December 6th), and the Parties will thereafter hold a complete conference and present a joint discovery plan to the Court at the later date (as well as have a better understanding of the issues that will be in dispute so as to be able to best answer any questions that the Court might have at the first appearance).

WHEREFORE, the Parties jointly request that the Court reschedule the Initial Status Conference (presently set in this matter for December 6, 2011 at 9:30 a.m.), to a date during the week of either December 19, 2011 or December 26, 2011, and that the Parties be permitted to hold the Rule 26(f) conference and submit a joint discovery plan on dates after December 6, 2011 (to be determined by the Court).

Dated: November 14, 2011

**TIMELINES, INC.**

By: /s/ Douglas A. Albritton  
One of its Attorneys

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**FACEBOOK, INC.**

By: One of its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that he served the foregoing Parties' Agreed Motion to Reschedule the Initial Status Conference 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 November 14, 2011.

/s/ Douglas A. Albritton  
Douglas A. Albritton