

**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.)	

**PLAINTIFF TIMELINES, INC.'S REPLY
IN SUPPORT OF MOTION TO CLARIFY AND COMPEL**

Plaintiff, Timelines, Inc. (“Timelines”), through its counsel, files this brief reply in support of its motion to clarify the discovery schedule in this case and to compel Defendant Facebook, Inc. to produce the requested documents by a date certain.

In its opposition, Facebook advises the Court that it expects to continue producing documents on a rolling basis and to complete its production by the end of July. But to date, Facebook’s promised rolling production is anything but rolling. In fact, as set forth in Timelines’s motion, on June 14th, Facebook’s counsel indicated that Facebook would make another rolling production on or before June 22nd. Yet Facebook never produced the documents. Timelines’s concern is that Facebook intends to dump virtually all of its document production (potentially thousands of documents as suggested by Facebook’s filing) on Timelines on or about July 31st, which will force Timelines to review these documents before proceeding with and completing fact depositions by August 31st. To that end (and accepting Facebook’s position that a complete production of its documents by June 29th is “logistically impossible”), Timelines respectfully requests that the Court order Facebook to make a rolling production of

documents beginning on June 30th and ending no later than July 31st, with not less than one production to Timelines each week.

Timelines also asks the Court to clarify the discovery schedule in the case, and, specifically, indicate whether the schedule set forth in the Joint Initial Status Report is controlling. (Dkt. 36 at p. 2.)

Dated: June 26, 2012

Respectfully submitted,

TIMELINES, INC.

By: /s/ Raven Moore
One of its Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that she filed the foregoing Plaintiff Timelines, Inc.'s Reply in Support of Motion to Clarify and Compel 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 June 26, 2012.

/s/ Raven Moore

Raven Moore