

**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 FOR EXTENSION OF THE DEADLINE  
FOR THE CLOSE OF FACT DISCOVERY**

Plaintiff Timelines, Inc. and Defendant Facebook, Inc., through their respective counsel, respectfully request an extension of the deadline for the close of fact discovery until September 28, 2012. The parties have met and conferred regarding this matter and agree that an extension is necessary for the completion of fact discovery, primarily due to the availability of party representatives and third parties for depositions. The requested extension of the fact discovery deadline is not for purposes of delay and will not impact any other deadlines in this case.

Dated: August 24, 2012

Respectfully submitted,

**TIMELINES, INC.**

By: /s/ Raven Moore

James T. Hultquist (#6204320)  
Douglas Alan Albritton (#6228734)  
Raven Moore (#6280665)  
REED SMITH LLP  
10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, Illinois 60606-7507  
(312) 207-1000  
(312) 207-6400 (facsimile)  
jhultquist@reedsmith.com  
dalbritton@reedsmith.com  
rmoore@reedsmith.com

*Attorneys for Plaintiff-Counterdefendant  
Timelines, Inc.*

**FACEBOOK, INC.**

By: /s/ Brendan J. Hughes

Peter J. Willsey (*pro hac vice*)  
Brendan J. Hughes (*pro hac vice*)  
COOLEY LLP  
777 6<sup>th</sup> Street, NW, Suite 1100  
Washington, DC 20001  
Phone: (202) 842-7800  
Fax: (202) 842-7899  
Email: pwillsey@cooley.com  
bhughes@cooley.com

Michael G. Rhodes (*pro hac vice*)  
COOLEY LLP  
101 California Street, 5th Floor  
San Francisco, CA 94111-5800  
Phone: (415) 693-2000  
Fax: (415) 693-2222  
Email: rhodesmg@cooley.com

Steven D. McCormick (IL Bar No. 1824260)  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654-3406  
Tel: (312) 862-2000  
Fax: (312) 862-2200  
Email: smccormick@kirkland.com

*Attorneys for Defendant-Counterplaintiff  
Facebook, Inc.*

**CERTIFICATE OF SERVICE**

I, Raven Moore, hereby certify that I filed the foregoing AGREED MOTION FOR EXTENSION OF THE DEADLINE FOR THE CLOSE OF FACT DISCOVERY on August 24, 2012 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.

/s/ Raven Moore  
Raven Moore (#6280665)  
REED SMITH LLP  
10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, Illinois 60606-7507  
(312) 207-1000  
(312) 207-6400 (facsimile)  
rmoore@reedsmith.com