

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

| | | |
|--|---|------------------------------|
| TIMELINES, INC., |) | |
| |) | |
| <i>Plaintiff/Counter- Defendant,</i> |) | |
| |) | |
| v. |) | Civil Action No.: 11 CV 6867 |
| |) | |
| FACEBOOK, INC., |) | Jury Trial Demanded |
| |) | |
| <i>Defendant/Counter- Plaintiff.</i> |) | |

**TIMELINES, INC.’S MOTION TO EXCUSE JAMES T. HULTQUIST FROM
ATTENDING THE PRETRIAL CONFERENCE**

Plaintiff/Counter-Defendant Timelines, Inc. (“Timelines”), through its counsel Reed Smith LLP, moves this Court for an Order excusing attorney James T. Hultquist, trial counsel for Timelines, from attending the pretrial conference. In support of its Motion, Timelines states as follows:

1. On January 26, 2012, the Court entered an order that, among other things, scheduled a pretrial conference for April 18, 2013.
2. On January 28, 2013, the Judge’s staff informed counsel for Timelines that all attorneys who will appear at trial must appear at the pretrial conference.
3. Attorney James T. Hultquist is trial counsel for Timelines but due to a schedule conflict cannot appear at the pretrial conference.
4. On the same day as the pretrial conference, Mr. Hultquist must appear at a *Markman* hearing in a patent infringement suit— in which he is lead counsel—that is currently pending

before Judge Susan Illston in the Northern District of California: *Mount Hamilton Partners LLC v. Groupon, Inc.*, Case Number: 3:12-cv-01700-SI.

6. Attorney Douglass A. Albritton, who is also trial counsel for Timelines and who has represented Timeline since this suit was first filed, will be attending the pretrial conference with other attorneys from Reed Smith and has full authority to act on behalf of Timelines.

7. Given Mr. Hultquist's scheduling conflict, Timelines respectfully requests that the Court excuse his attendance at the pretrial conference.

CONCLUSION

WHEREFORE, Timelines, Inc. requests that this Court enter an order excusing attorney James T. Hultquist from attending the pretrial conference scheduled for April 18, 2013 and such other relief that the Court deems just and proper.

Dated: January 30, 2013

Respectfully submitted,
TIMELINES, INC.,
Plaintiff/Counter-Defendant

By: /s/ Douglas A. Albritton
James T. Hultquist (SBN 6204320)
Douglas A. Albritton (SBN 6228734)
Raven Moore (SBN 6280665)
REED SMITH LLP
10 South Wacker Drive
Chicago, IL 60606-7507
Telephone: +1 312 207 1000
Facsimile: +1 312 207 6400
*Counsel for Plaintiff/Counter-Defendant
Timelines, Inc.*