SPRINT COMMUNICATIONS COMPANY L.P.,	)
Plaintiff,	)
v.	) CASE NO. 05-2433 JWL
THEGLOBE.COM, INC.,	)
VOICEGLO HOLDINGS, INC., VONAGE HOLDINGS CORP., and	)
VONAGE AMERICA, INC.,	)
Defendants	)

## SECOND UNOPPOSED MOTION FOR AN EXTENSION OF TIME FOR ALL DEFENDANTS TO RESPOND TO PLAINTIFF'S MOTION FOR ENTRY OF PROTECTIVE ORDER GOVERNING DISCOVERY THAT INCLUDES AN IN-HOUSE COUNSEL PROVISION

COMES NOW Defendants theglobe.com, Inc. and Voiceglo Holdings, Inc. and hereby move the Court to extend the time for all defendants to respond to Plaintiff's Motion for Entry of Protective Order Governing Discovery that Includes an In-House Counsel Provision. In support, Defendants state as follows:

- 1. Plaintiff Sprint filed its Motion for Entry of Protective Order Governing Discovery that Includes an In-House Counsel Provision on February 6, 2006 ("Motion") (Doc. 55). Pursuant to Local Rule 6.1(d)(1), the original date for responding to said Motion was February 21, 2006.
- 2. Defendants requested and were granted one prior extension of time to respond to the Motion, and that extension expires today.
- 3. Counsel for Plaintiff and both Defendants have been working in good faith to come to an agreement with regard to a Protective Order. The parties are currently in agreement regarding the language of most of the provisions of the proposed Protective Order submitted by

Sprint. However, the parties continue to work on a few provisions of the Protective Order regarding access to confidential information by in-house counsel. The parties anticipate reaching a resolution by the end of this week.

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- 4. Counsel for all Defendants have conferred with counsel for Sprint, and Sprint's counsel does not oppose this request for an extension of time.
- 5. It is requested that all Defendants be allowed until Friday, March 3, 2006 to respond.

WHEREFORE, for the foregoing reasons, it is respectfully requested that the Court enter an Order granting all Defendants until March 3, 2006 to respond to Plaintiff's Motion.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of February, 2006, I electronically filed the above and foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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