

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

TIMEBASE PTY LTD.,

Plaintiff,

vs.

THE THOMSON CORPORATION,  
WEST PUBLISHING CORPORATION,  
and WEST SERVICES, INC.,

Defendants.

**Civil No. 07-1687 (JNE/JJG)**

**UNOPPOSED MOTION TO  
EXTEND THE PRETRIAL  
SCHEDULE BY THIRTY DAYS**

Pursuant to Local Rule 16.3, and for the reasons stated below, defendants The Thomson Corporation, West Publishing Corporation, and West Services, Inc. move the Court for leave to extend the remaining dates of the Pretrial Scheduling Order by approximately thirty days. Plaintiff TimeBase Pty Ltd. does not oppose this motion. A Proposed Order for such an extension is submitted herewith.

*1. Background to the Motion.* Since the entry of the Court's Order Modifying Pretrial Scheduling Order dated February 1, 2011, the parties have worked diligently to complete expert discovery. The parties have exchanged all expert reports and have been working to schedule and complete expert depositions. Because TimeBase's experts in this case include the Chair of the Department of Computer Sciences at Georgetown who holds academic appointments with supervisory, research, and teaching responsibilities, the parties have been unable to schedule his deposition within the current deadline on a date that works for Dr. Frieder and defendants' counsel.

The parties are identifying workable dates in June for the academic experts so that these depositions will be completed within an additional thirty-day period. Accordingly, defendants request, and TimeBase does not oppose, that the Court approve a short extension of thirty days for the remaining pretrial deadlines.

**2. *Statement of Good Cause.*** Good cause exists to extend the current Pretrial Scheduling Order deadlines by thirty days because the parties have been working diligently to complete expert discovery and need a short extension of time in which to accommodate the schedules of academic experts.

**3. *Completed Discovery.*** The parties have completed all discovery except for expert depositions.

**4. *Discovery that Remains to be Completed.*** The only discovery that remains to be completed are expert depositions.

**5. *The Proposed Extension.*** A short thirty-day extension is requested for the remaining pretrial deadlines as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Requested Deadline</b>
Expert Discovery Completed	May 20, 2011	June 20, 2011
Non-Dispositive Motions re: Expert Discovery	May 20, 2011	June 20, 2011
Deadline for Filing Dispositive Motions	June 1, 2011	July 1, 2011
Trial Ready	August 16, 2011	September 16, 2011

Respectfully submitted,

Dated: April 25, 2011

*s/Kevin P. Wagner*

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