

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

STC.UNM,

Plaintiff,

v.

CV-2010-1077 RB/WDS

INTEL CORPORATION,

Defendant.

**UNOPPOSED JOINT MOTION FOR FURTHER EXTENSION OF TIME TO  
RESPOND TO DISCOVERY OBJECTIONS UNDER D.N.M. LR-CIV.26.6**

The parties hereby respectfully request that the Court enter its Order further extending the forty-five (45) day time period under D.N.M. LR-Civ.26.6 for an additional twenty-one (21) days, during which Intel may move to compel regarding STC's May 2, 2011 privilege logs and responses to Intel's discovery requests under D.N.M. LR-Civ.37.1<sup>1</sup>. Due to the complex nature of this patent infringement case and the technical and sensitive nature of the documents that will be exchanged in discovery, the parties request an additional twenty-one (21) days time to meet and confer to resolve discovery disputes before having to proceed under D.N.M. LR-Civ.37.1.

Pursuant to D.N.M. LR-Civ.7.1(a), this Motion is jointly made on behalf of all parties to this litigation and is unopposed. The parties agree that due to the nature and scope of discovery in this case, good cause exists to further extend the current 45 day time period under Local Rule 26.6 for an additional 21 days to allow the parties sufficient time to meet and confer after service of discovery objections or privilege claims and to avoid having to burden the Court with unnecessary motion practice.

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<sup>1</sup> By Order dated March 21, 2011 [Doc. No. 53], the Court extended the period under D.N.M.LR-Civ.26.6 from twenty-one (21) days to forty-five (45) days for all discovery objections served in this case.

WHEREFORE, for the reasons set forth above, the parties respectfully request that the Court enter its Order further extending the time period under D.N.M. LR-Civ.26.6 from forty-five (45) days for an additional twenty-one (21) days for Intel to move to compel regarding STC's May 2, 2011 privilege logs and responses to Intel's discovery requests.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 15<sup>th</sup> day of June, 2011 the foregoing was filed electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means.

/s/ Clifford K. Atkinson  
Clifford K. Atkinson