

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

STC.UNM,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

No. 10-CV-01077-RB-WDS

**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 sixty (60) days, during which STC may move to compel regarding its April 15, 2011 request for an inspection of Intel's semiconductor fabrication facility D1D, located in Hillsboro, Oregon, under D.N.M. LR-Civ.37.1¹

As set forth in its objections, Intel does not believe there are any circumstances under which STC's requested inspection is likely to lead to the discovery of admissible evidence. STC submits that an additional 60 days will permit it to evaluate, in view of other requested discovery, whether it believes an inspection of Intel's manufacturing facility is necessary, and potentially to resolve any 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 possibility of avoiding motion practice on this issue, good cause exists to further extend the current 45 day time period under

¹ 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.

Local Rule 26.6 for an additional 60 days.

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 60 days for STC to move to compel regarding request for a factory inspection.

Respectfully submitted,

/s/ Steven R. Pedersen

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 29th 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/ Steven R. Pedersen
