

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

STC.UNM,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case 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 respectfully request that the Court enter an Order further extending the time period as set by the Court's June 17, 2011 Order [Doc. No. 109] for an additional twenty-one (21) days, during which time Intel may move to compel regarding STC's May 2, 2011 privilege logs and responses to Intel's discovery request under D.N.M LR-Civ.37.1. The parties previously agreed to extend the time period for moving to compel by twenty-one (21) days. The parties used the prior extension to meet and confer and have successfully resolved most of their remaining disputes. STC requires additional time to produce certain documents, update its privilege logs, and consider Intel's remaining concerns. Consequently, the parties request an additional 21 days 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 deadline so the parties can resolve their disputes without having to burden the Court with unnecessary motions practice.

WHEREFORE, for the reasons set forth above, the parties respectfully request that the Court enter its Order further extending the time period under its June 17, 2011 Order for an additional twenty-one (21) days for Intel to move to compel documents regarding STC's May 2,

2011 privilege logs and responses to Intel's discovery requests.

Dated: July 7, 2011

Respectfully submitted,

ATKINSON, THAL & BAKER, P.C.

/s/ Justin D. Rodriguez

Clifford K. Atkinson
Douglas A. Baker
Justin D. Rodriguez
201 Third Street NW, Suite 1850
Albuquerque, New Mexico 87102
(505) 764-8111

Robert A. Van Nest
Brian L. Ferrall
KEKER & VAN NEST LLP

Chad S. Campbell
Jonathan M. James
Timothy J. Franks
Mark E. Strickland
Jonathan L. McFarland
PERKINS COIE LLP

Attorneys for Defendant
Intel Corporation

AND

/s/ Keith Vogt (via email)

Deron B. Knoner, Esq.
KELEHER & MCLEOD, P.A.
PO Box AA
Albuquerque, NM 87103
(505) 842-9150

George C. Summerfield, Esq.
Joseph A. Gear, Esq.
Keith A. Vogt, Esq.
Rolf O. Stadheim, Esq.
Steven R. Pedersen, Esq.
STAHEIM & GREAR, LTD.

Attorneys for Plaintiff
STC.UNM