

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:07-cv-00347-D

LULU ENTERPRISES, INC.,

Plaintiff,

vs.

N-F NEWSITE, LLC,

and

HULU TECH, INC.,

Defendants.

**JOINT PLAN FOR EXPEDITED
DISCOVERY**

Plaintiff Lulu Enterprises, Inc. (“Lulu”) and Defendant Hulu, LLC formerly known as N-F NewSite, LLC (“Hulu”) hereby submit their joint plan for expedited discovery, as required by this Court’s September 14, 2007 Order.

1. The parties have already exchanged expedited discovery requests and Notices of Deposition. The requests and notices are attached to this Joint Plan for Expedited Discovery as Exhibits A (Plaintiff’s Requests) and B (Defendant’s Requests).

2. The parties anticipate that some of the responsive documents are confidential and proprietary. Accordingly, in the very near future, the parties will submit a proposed Consent Protective Order to the Court for its consideration.

3. Unless otherwise agreed, the parties shall exchange responses to the expedited discovery requests, including production of the responsive documents, by 6:00 pm on Tuesday, September 24, 2007.

4. Unless otherwise agreed, Plaintiff will take the deposition of Hulu on Thursday, September 27, 2007 at 1:00 p.m. in Los Angeles, California at 2121 Avenue of the Stars, Suite 700. The deposition shall last no longer than four hours.

5. Unless otherwise agreed, Defendant will take the deposition of Lulu on Wednesday, October 3, 2007 at 10:00 a.m. in Cary, North Carolina at the offices of Ellis & Winters. The deposition shall last no longer than four hours.

Respectfully submitted, this the 18th day of September, 2007.

/s/ Leslie C. O'Toole

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