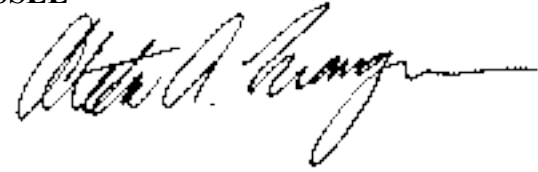


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED



ENERGY AUTOMATION)
 SYSTEMS, INC.,)
)
 Plaintiff,)
)
 v.)
)
 XCENTRIC VENTURES, LLC, d/b/a)
 BADBUSINESS BUREAU and/or)
 BADBUSINESSBUREAU.COM)
 and/or RIP-OFF REPORT and/or)
 RIPOFFREPORT.COM, and)
 EDWARD MAGEDSON a/k/a ED)
 MAGEDSON,)
)
 Defendants.)

CIVIL ACTION NO. 3-06-1079

Judge Aleta Trauger
Magistrate Judge Juliet Griffin

JURY DEMAND

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF ITS
MOTION TO LIFT STAY ON DISCOVERY FOR LIMITED PURPOSE OF
DISCOVERING JURISDICTIONAL FACTS**

Pursuant to Local Rule 7.01(b), Plaintiff Energy Automation Systems, Inc. (“EASI”) moves the Court for leave to file a Reply in support of its Motion to Lift the Stay on Discovery for the Limited Purpose of Discovering Jurisdictional Facts (Doc. No. 24). A copy of EASI’s Reply is attached to this Motion as Exhibit A.

Defendant Xcentric Ventures, LLC’s (“Xcentric”) response (Doc. No. 31) contains inaccuracies that necessitate a reply and clarification. Specifically, instead of addressing EASI’s request for discovery, Xcentric argues that no “factual disputes” remain and the Court should dismiss the suit. EASI should be provided the opportunity to address Xcentric’s reliance on an inappropriate standard for the instant motion. EASI respectfully requests the opportunity to