

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**NORTHEASTERN UNIVERSITY and  
JARG CORPORATION**

**Plaintiffs,**

**v.**

**GOOGLE, INC.**

**Defendant.**

**CIVIL ACTION NO. 2:07-CV-486-CE**

**JOINT MOTION TO EXTEND TIME FOR ADDITIONAL DISCLOSURES**

Plaintiffs Northeastern University and Jarg Corporation (“Plaintiffs”) and Defendant Google Inc. (“Google”) hereby jointly move this Court for an extension of time for the deadline to produce all liability related documents. Counsel for Plaintiffs and Defendant have conferred and have agreed upon a mutually agreeable date.

As set forth in the Court’s August 21, 2008 Discovery Order, by May 8, 2009, “[e]ach party, without awaiting a discovery request, shall provide, to the extent not already provided, to every other party . . . a copy of all documents, electronically stored information, and tangible things in the possession, custody, or control of the party that are relevant to liability related issues.”. Dkt. No. 82. The parties seek a one month extension—until June 5, 2009—of that deadline.

Both parties have been cooperating to aid in the identification of liability related materials and have made substantial progress in their production. The requested extension will not affect other dates in the Court’s Docket Control Order or Discovery Order. Good cause exists for this Motion, and this Motion is not sought for purposes of delay.

Dated: May 8, 2009

Respectfully submitted,

/s/ Stephen C. Stout

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 8, 2009. Any other counsel of record will be served by first class mail on this same date.

/s/ Stephen C. Stout

Stephen C. Stout