

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

IP INNOVATION L.L.C. AND)	
TECHNOLOGY LICENSING)	
CORPORATION,)	CASE NO. 2:07cv503-LED
)	
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
GOOGLE INC.,)	
)	
Defendant.)	

**AGREED MOTION FOR LEAVE TO AMEND
BRIEFING SCHEDULE AND DEADLINE FOR MEDIATION**

The Parties hereby request that the Court extend the briefing schedule for the response and reply briefs related to Google's pending motion to dismiss and the deadline to complete mediation. Specifically, the parties request that the due date for the response brief be moved from January 20th (the current due date under Local Rule CV-7) to February 6th, and that the reply brief be given an extra week beyond the 5 days normally allotted under Local Rule CV-7, i.e., until February 20th. The parties further request that the Court extend the deadline to complete mediation from January 31, 2009 (the current deadline) to April 16, 2008. A proposed order is attached. In support this motion, the parties state as follows:

1. The plaintiffs believe that the pending motion may require third party input, including possibly one or more third party declarations, to address certain of the allegations raised by the motion. The plaintiffs have contacted representatives for these third parties, but have not yet talked to any likely declarant(s).
2. Defendant Google has agreed to the filing of the present motion.

3. Therefore, for the reasons stated herein, the parties respectfully request this Court extend the brief schedule under Local Rule CV-7 to permit a response brief by Plaintiffs to be filed on or before February 6th, with a reply by Google on or before February 20th.

4. The Parties also respectfully request that the Court amend the date for completion of mediation from January 31, 2009 to be completed by April 16, 2009. The Parties have consulted with the mediator, and believe this will allow the negotiations between the Parties to include the positions briefed regarding Google's Motion to Dismiss for Lack of Standing. The Parties anticipate completing the motion-related briefing in February. Accordingly, the Parties respectfully request that the Court extend the deadline for completion of mediation to April 16, 2009.

Respectfully submitted,

/s/ Douglas M. Hall

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **AGREED MOTION TO AMEND**

BRIEFING SCHEDULE was served electronically on the below listed on January 16, 2009.

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