

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

SOFTWARE RIGHTS ARCHIVE, LLC

§

v.

§

CIVIL NO. 2:07-cv-511 (TJW-CE)

§

§

GOOGLE, INC., et al.

§

**PLAINTIFF'S UNOPPOSED MOTION FOR A 22-DAY EXTENSION TO RESPOND
TO DEFENDANTS' MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(a)**

Plaintiff Software Rights Archive, LLC ("SRA") files this Unopposed Motion for a 22-Day Extension to Respond to Defendants' Motion to Transfer Pursuant to 28 U.S.C. § 1404(a).

Defendants filed the motion to transfer on February 20, 2009. SRA's response is currently due on March 8. SRA requested Defendants' agreement to an extension of this due date by 60 days. SRA explained that it needs the time to conduct discovery and that SRA's counsel will be engaged in intense pretrial preparations and trial in the case of *Quantum World v. Lenovo*, Civil Action No. 2:07-cv-24-CE, which is set for trial in this Court on March 23. Defendants declined to agree to the 60-day extension, contending that no discovery is necessary. (See Ex. A.) Therefore, simultaneous with this motion, SRA is filing an Opposed Motion for a 60-Day Extension to Respond to Defendants' Motion to Transfer Pursuant to 28 U.S.C. § 1404(a). Without conceding SRA's need for discovery, however, Defendants did agree to a 22-day extension. (See Ex. A.) Therefore, SRA now moves this Court to order an extension of the due date for their response to Defendants' motion to transfer to March 31.

Respectfully submitted,

Lee Kaplan (by RD)

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Tom Walsh, Mark Baker, and Richard Hung, counsel for Defendants. Mark Baker advised me on behalf of Defendants that Defendants dispute SRA's entitlement to discovery related to their motion to transfer, but nevertheless do not oppose the relief requested in this motion.

Lee Kaplan (by RD)
Lee L. Kaplan

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to all counsel of record pursuant to Federal Rules of Civil Procedure on this the 2nd day of March, 2009.

Lee Kaplan (by RD)
Lee L. Kaplan