

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

SOFTWARE RIGHTS ARCHIVE, LLC

v.

**GOOGLE INC., YAHOO! INC., IAC
SEARCH & MEDIA, INC., AOL, LLC,
AND LYCOS, INC.**

Civil Case No. 2:07-cv-511 (CE)

JOINT MOTION TO FURTHER EXTEND CERTAIN SCHEDULING DEADLINES

Come now Plaintiff Software Rights Archive, LLC and Defendants IAC Search & Media, Inc. and Lycos, Inc. and file this Joint Motion to Further Extend Certain Scheduling Deadlines, and in support of same would show the Court as follows:

1. Plaintiff Software Rights Archive, LLC and Defendants IAC Search & Media, Inc. and Lycos, Inc. have reached agreement to extend a certain scheduling deadline in this matter. The current deadline and the agreed to extended deadline appear in the below chart:

<u>EVENT</u>	<u>CURRENT DEADLINE</u> <u>(All Defendants)</u>	<u>AGREED TO EXTENDED</u> <u>DEADLINE</u> <u>(Defendants IAC Search &</u> <u>Media, Inc. and Lycos, Inc.)</u>
Deadline for Document Production under paragraph 3(b) of September 12, 2008 Discovery Order (Dkt. No. 82), as extended in Dkt. No. 166. As reflected in Dkt. No. 127, Source Code will not be included by Defendants in this production.	October 30, 2009	November 30, 2009

2. This case is still in its relatively early stages, and the above agreed to extended deadline will not adversely affect any other of the Court's deadlines. For example, jury selection is not scheduled to occur until May 2, 2011.

This Motion is not sought for delay, but that justice might be done.

WHEREFORE, Plaintiff Software Rights Archive, LLC and Defendants IAC Search & Media, Inc. and Lycos, Inc. jointly and respectfully request that the above deadline be further extended as agreed to by these parties as set forth in the above chart.

Dated: October 30, 2009

Respectfully submitted,

By: /s/ Collin Maloney
Otis Carroll
Tex. Bar No. 03895700
Collin Maloney
Tex. Bar No. 00794219
IRELAND, CARROLL & KELLEY, P.C.
6101 S. Broadway, Suite 500
Tyler, Texas 75703
Tel: (903) 561-1600
Fax: (903) 581-1071
Email: Fedserv@icklaw.com

Claude M. Stern (CA Bar No. 96737)
Jennifer A. Kash (CA Bar No. 203679)
QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP
555 Twin Dolphin Drive, Suite 560
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100
Email: claudestern@quinnemanuel.com
Email: jenniferkash@quinnemanuel.com

Attorneys for Defendants IAC SEARCH &
MEDIA, INC. and LYCOS, INC.

By: /s/ Lee L. Kaplan (by permission Collin Maloney)

Lee L. Kaplan
LEAD ATTORNEY
State Bar No. 11094400
SMYSER KAPLAN & VESELKA, L.L.P.
700 Louisiana, Suite 2300
Houston, Texas 77002
(713) 221-2323
(713) 221-2320 (fax)
lkaplan@skv.com

Victor G. Hardy
State Bar No. 00790821
(Requesting Admission *Pro Hac Vice*)
Andrew G. DiNovo
State Bar No. 00790594
Adam G. Price
State Bar No. 24027750
Jay D. Ellwanger
State Bar No. 24036522
DiNOVO PRICE ELLWANGER LLP
P.O. Box 201690
Austin, Texas 78720
(512) 681-4060
(512) 628-3410 (fax)
vhardy@dpelaw.com

Of counsel:

S. Calvin Capshaw
State Bar No. 03783900
Elizabeth L. DeRieux
State Bar No. 05770585
CAPSHAW DERIEUX
1127 Judson Road, Suite 220
P.O. Box 3999
Longview, TX 75606-3999
(903) 236-9800
(903) 236-8787 (fax)
ccapshaw@capshawlaw.com

Robert M. Parker
State Bar No. 15498000
Robert C. Bunt
State Bar No. 00787165
Charles Ainsworth
State Bar No. 0078352
PARKER, BUNT & AINSWORTH, P.C.
100 East Ferguson, Suite 1114
Tyler, Texas 75702
(903) 531-3535
(903) 533-9687 (fax)

Attorneys for Plaintiff SOFTWARE
RIGHTS ARCHIVE, LLC

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 30th day of October, 2009, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Collin Maloney
Collin Maloney