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

SOFTWARE RIGHTS ARCHIVE, LLC	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	Civil Action No. 2:07-cv-511-CE
GOOGLE INC., YAHOO! INC.,	§	
IAC SEARCH & MEDIA, INC., AOL LLC	C, §	
and LYCOS, INC.	§	
·	§	JURY TRIAL DEMANDED
Defendants.	§	

#### PLAINTIFF'S UNOPPOSED MOTION TO EXTEND PAGE LIMITS

Plaintiff Software Rights Archive, LLC ("SRA") respectfully moves this Court to extend its page limit for its Motion to Compel and also Google's page limit for its response thereto. In support of this request, SRA states as follows:

The Local Rules of this Court limit SRA's Motion to Compel to 15 pages. SRA's motion presents multiple discovery disputes, however, spanning a nearly two-year time frame. These disputes share a common chronology, and it would be more efficient to present them in a single motion than to present them in multiple piecemeal motions. SRA therefore requests this Court to extend its page limit for this motion to 25 pages. Defendant Google does not oppose this motion, though it does oppose the propriety of SRA's Motion to Compel. SRA and Google agree that, if SRA is granted this extension of page limit, Google likewise should be accorded an extension of the page limit for its response to 25 pages.

WHEREFORE, SRA respectfully requests this Court to extend the page limit for its Motion to Compel, as well as the page limit for Google's response, to 25 pages, excluding attachments.

### Respectfully submitted,

Lee Keplan (by RD)

Lee L. Kaplah
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
(Admitted *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 HARDY LLP

7000 North MoPac Expressway Suite 350 Austin, Texas 78731 (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)

## **CERTIFICATE OF CONFERENCE**

I hereby certify that SRA conferred with Google's counsel regarding this motion. Google does not oppose SRA's request for an extension of the page limit for its motion to compel to 25 pages, subject to SRA's agreement (which SRA gives) to an extension of Google's page limit for its response to 25 pages.

Raj Duvvuri

### **CERTIFICATE OF SERVICE**

I hereby certify 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 December 10, 2009.

Rai Duvvuri