

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

BENEFICIAL INNOVATIONS, INC.,

Plaintiff,

vs.

CAREERBUILDER LLC., *et al.*;

Defendants.

CASE NO. 2:09-CV-175 (TJW)

**Jury Demanded**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE INITIAL DISCLOSURES  
UNDER P-R 3.1 AND 3.2**

COMES NOW Plaintiff Beneficial Innovations, Inc., and files this Joint Motion for Extension of Time to File Initial Disclosures Under P-R 3.1 and 3.2 by and between Plaintiff Beneficial Innovations, Inc. (“Beneficial”), Defendants Comcast Corporation (“Comcast”), Disney Online and The Walt Disney Company (Collectively, “Disney”), and IAC Search & Media, Inc. (“IAC”) (collectively, the “Parties”) in said cause and in support of such motion would respectfully show to the Court the following:

Plaintiff served its Disclosures under P-R 3.1 and 3.2 with respect to Defendant New York Times on December 1, 2010. Plaintiff and Defendants Comcast, Disney, and IAC believe that it would be beneficial to extend the deadline for the service of Plaintiff’s P-R 3-1 and 3-2 disclosures with respect to these Defendants, as well as Comcast’s Rule 26 disclosures. The Parties respectfully requests an extension of time to and including December 14, 2010, to file

Plaintiff's disclosures pursuant to R-R 3.1 and 3-2 with respect to Defendants Comcast, Disney, IAC, and Comcast's Rule 26 disclosures.

WHEREFORE, the Parties respectfully request that the Court grant this Motion.

Dated: December 3, 2010

Respectfully submitted,

BENEFICIAL INNOVATIONS, INC.

By: /s/ Julien A. Adams

Gregory S. Dovel  
Cal. State Bar No. 135387  
Julien A. Adams  
Cal. State Bar No. 156135  
Dovel & Luner, LLP  
201 Santa Monica Blvd., Suite 600  
Santa Monica, CA 90401  
Telephone: (310) 656-7066  
Facsimile: (310) 657-7069  
Email: greg@dovellaw.com

ATTORNEYS FOR PLAINTIFF,  
BENEFICIAL INNOVATIONS, INC.

/s/ David J. Silbert (with permission)

Daniel K. Nazer  
David J. Silbert  
Keker & Van Nest  
710 Sansome St.  
San Francisco, CA 94111  
Telephone: (415) 391-5400  
E-mail: dnazer@kvn.com  
E-mail: DSilbert@kvn.com

Deron R. Dacus  
Ramey & Flock  
100 East Ferguson  
Suite 500  
Tyler, TX 75702  
Telephone: (903) 597-3301  
E-mail: ddacus@rameyflock.com

ATTORNEYS FOR DEFENDANT  
COMCAST CORPORATION

/s/ Kevin A. Smith (with permission)

Charles K. Verhoeven

Howard Y. Chen

Jennifer A. Kash

Kevin A. Smith

Quinn Emanuel Urquhart & Sullivan LLP

50 California Street

22nd Floor

San Francisco, CA 94111

Telephone: (415) 875-6600

E-mail: charlesverhoeven@quinnemanuel.com

E-mail: howardchen@quinnemanuel.com

E-mail: jenniferkash@quinnemanuel.com

E-mail: kevinsmith@quinnemanuel.com

J. Thad Heartfield

M. Dru Montgomery

The Heartfield Law Firm

2195 Dowlen Rd.

Beaumont, TX 77706

Telephone: (409) 866-3318

E-mail: thad@jth-law.com

E-mail: dru@jth-law.com

ATTORNEYS FOR DISNEY ONLINE AND  
IAC SEARCH & MEDIA, INC.

**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 December 3, 2010. Any other counsel of record will be served by facsimile transmission and first class mail.

/s/ Julien A. Adams

Julien A. Adams