

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

GOOSEBERRY NATURAL RESOURCES,
LLC,

Plaintiff,

v.

CONDESA, INC.,
MASS MEDIA DISTRIBUTION, LLC
MEK ENTERPRISES d/b/a
ERELEASES.COM,
PROVEN WAYS, INC.,
PR WORLDWIDE, INC., and
RV MEDIA, LLC d/b/a PR 18 NETWORK,

Defendants.

Civil Action No. 2:10-CV-210-TJW

JURY TRIAL DEMANDED

**SECOND AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Gooseberry Natural Resources, LLC, and Defendant RV Media, LLC d/b/a PR 18 Network (*pro se*) respectfully move this Court for an extension of time for Defendant RV Media, LLC d/b/a PR 18 Network to respond to Plaintiff's Complaint for Patent Infringement, and would show the Court as follows:

1. On June 24, 2010, Plaintiff filed its Complaint for Patent Infringement.
2. On June 28, 2010, RV Media, LLC d/b/a PR 18 Network was served with Plaintiff's Complaint.
3. Pursuant to Federal Rules of Civil Procedure 12(a)(1)(A) and 6(d), RV Media, LLC d/b/a PR 18 Network's response to Plaintiff's Complaint is due on July 19, 2010.

4. On July 13, 2010, RV Media, LLC d/b/a PR 18 Network (*pro se*) sought a 30-day extension from Plaintiff to respond to Plaintiff's Complaint, and Plaintiff agreed to a 30-day extension, until August 18, 2010.

5. On August 16, 2010, RV Media, LLC d/b/a PR 18 Network (*pro se*) sought a second extension from Plaintiff to respond to Plaintiff's Complaint, and Plaintiff agreed to an extension, until September 28, 2010.

WHEREFORE, Plaintiff, Gooseberry Natural Resources, LLC, and Defendant RV Media, LLC d/b/a PR 18 Network (*pro se*) request that the Court enter an order extending the time for Defendant RV Media, LLC d/b/a PR 18 Network to answer Plaintiff's Complaint to September 28, 2010.

Respectfully submitted,

DATED: August 16, 2010

/s/Melissa Richards Smith
Melissa Richards Smith
Texas State Bar No. 24001351
GILLAM & SMITH, L.L.P.
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
E-mail: melissa@gillamsmithlaw.com

ATTORNEY FOR PLAINTIFF

RV Media, LLC d/b/a PR 18 Network
(*pro se*)
c/o V. Dave
Incorp Services, Inc.
815 Brazos Street, Suite 500
Austin, Texas 78701
Telephone: (281) 815-4788
E-mail: dave@1888pressrelease.com

DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. mail or facsimile transmission, on this the 16th day of August, 2010.

/s/Melissa Richards Smith

Melissa Richards Smith