

**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.

Case No. 2:10-cv-210

PATENT CASE

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant MEK Enterprises d/b/a eReleases.com ("MEK") moves this Court for an extension of time for MEK to answer or otherwise respond to Plaintiff's Complaint, and respectfully shows the Court as follows:

1. On June 24, 2010, Plaintiff filed its Complaint.
2. Defendant MEK's deadline to answer or otherwise respond to Plaintiff's Complaint has been extended twice by this Court, and is currently due on September 28, 2010.
3. The parties have reached an agreement in principle to settle their dispute and are in the process of finalizing the paperwork to memorialize their agreement. The parties presently anticipate that this will be concluded and Plaintiff will be in a position to dismiss Defendant MEK within the next two weeks.
4. Counsel for Plaintiff and Counsel for MEK have agreed to a two-week extension, until October 12, 2010, for MEK to answer or otherwise respond to Plaintiff's Complaint.

WEHREFORE, Defendant MEK respectfully requests that the Court enter an order extending the time for MEK to answer or otherwise respond to Plaintiff's Complaint to October 12, 2010.

Dated: September 28, 2010

Respectfully submitted,

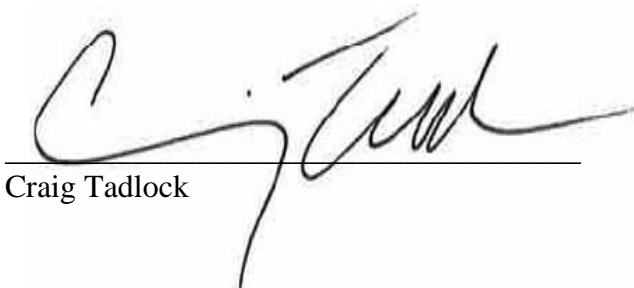


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*Counsel for Defendant MEK Enterprises
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who are deemed to 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(d) and (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 email, on this the 28th day of September, 2010.



Craig Tadlock