

**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, PR Worldwide, Inc., respectfully move this Court for a one day extension of time for PR Worldwide, Inc. 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 July 2, 2010, PR Worldwide, Inc. was served with Plaintiff's Complaint.
3. Pursuant to Federal Rules of Civil Procedure 12(a)(1)(A) and 6(d), PR Worldwide, Inc.'s response to Plaintiff's Complaint was due on July 19, 2010.
4. On July 16, 2010, PR Worldwide, Inc. sought a 60-day extension from Plaintiff to respond to Plaintiff's Complaint, and Plaintiff agreed to a 60-day extension, until September 17, 2010.

5. On August 11, 2010, PR Worldwide, Inc.'s counsel filed an unopposed motion to withdraw as counsel [*Dkt. 25*].

6. On August 12, 2010, the Court granted PR Worldwide, Inc.'s unopposed motion to withdraw as counsel [*Dkt. 26*]. Attorney Collin Michael Maloney was terminated but directed to continue as counsel until PR Worldwide, Inc. secured substitute counsel, the deadline being forty-five (45) days from the date of the Order.

7. On September 27, 2010, PR Worldwide, Inc. requested, and Plaintiff, Gooseberry Natural Resources, LLC, agreed to a one week extension of time for PR Worldwide, Inc. to secure substitute counsel and respond to Plaintiff's Complaint for Patent Infringement, up through and including October 4, 2010.

8. On October 4, 2010, PR Worldwide, Inc. has requested, and Plaintiff, Gooseberry Natural Resources, LLC, has agreed to a one day extension of time for PR Worldwide, Inc. to secure substitute counsel and respond to Plaintiff's Complaint for Patent Infringement. The parties continue in their efforts to finalize settlement negotiations.

WHEREFORE, Plaintiff, Gooseberry Natural Resources, LLC, and Defendant, PR Worldwide, Inc., request that the Court enter an order extending the time for PR Worldwide, Inc. to secure substitute counsel and respond to Plaintiff's Complaint up to and including October 5, 2010.

Respectfully submitted,

DATED: October 4, 2010

/s/Melissa Richards Smith  
Melissa Richards Smith  
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**ATTORNEY FOR PLAINTIFF**

**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 4th day of October, 2010.

/s/Melissa Richards Smith  
Melissa Richards Smith