

**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**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A PROPOSED  
DOCKET CONTROL ORDER AND DISCOVERY ORDER**

Plaintiff Gooseberry Natural Resources, LLC and Defendant Proven Ways, Inc. (collectively, the “Parties”) file this Joint Motion for an Extension of Time to File a Proposed Docket Control Order and Discovery Order and would respectfully show the Court the following:

Currently, the deadline for the Parties to submit a proposed docket control order and discovery order is March 2, 2011. *See* Dkt. No. 46. The Parties are diligently working on submitting a proposed docket control order and discovery order to the Court but request a short extension of time in order to finalize these proposed orders. As such, the Parties request an extension, through and including March 16, 2011, to submit a proposed docket control order and discovery order to the Court.

For these reasons, the Parties respectfully request that this Court enter an Order extending the deadline to file a proposed docket control order and discovery order through and including March 16, 2011.

DATED: March 1, 2011

Respectfully submitted,

/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](mailto:melissa@gillamsmithlaw.com)

**ATTORNEY FOR PLAINTIFF**

/s/David Kent Anderson (with permission)  
David Kent Anderson  
Anderson & Cunningham PC  
1001 Fannin Street, Suite 270  
Houston, TX 77002-6712  
Telephone: (713) 655-8400  
Facsimile: (713) 650-8745  
E-mail: [david@andersonlawfirm.com](mailto:david@andersonlawfirm.com)

**ATTORNEY FOR DEFENDANT  
PROVEN WAYS, INC.**

**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 1st day of March, 2011.

/s/Melissa Richards Smith  
Melissa Richards Smith