IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

ADVANCEME, INC.	§	
	§	
Plaintiff,	§	
•••	§	
v.	§	
	§	CAUSE NO. 6:05-CV-424 LED
RAPIDPAY, LLC, BUSINESS CAPITAL	§	
CORPORATION, FIRST FUNDS LLC,	§	
MERCHANT MONEY TREE, INC.,	§	
REACH FINANCIAL, LLC and	§	
FAST TRANSACT, INC. d/b/a	§	
SIMPLE CASH	§	
	§	
Defendants.	§	
	§	

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT IN DEFENDANTS REPLY IN SUPPORT OF ITS MOTION FOR LEAVE TO AMEND PRELIMINARY INVALIDITY CONTENIONS

Defendants First Funds LLC, Merchant Money Tree, Inc., and Reach Financial, LLC, (collectively "Defendants") respectfully request that the Court grant leave to exceed the page limit for their Reply Brief. Specifically, in order to properly reply to all the issues raised by Plaintiff in its Opposition Brief, Defendants request leave of Court to file 10 pages of argument plus 50 pages of exhibits in its Reply Brief in Support of its Motion for Leave to Amend **Preliminary Invalidity Contentions.**

Plaintiff and Defendants met and conferred by telephone conference regarding this motion on October 3, 2006 and agreed that this motion will be unopposed.

October 3, 2006

Respectfully submitted,

By: /s/ Willem G. Schuurman

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Counsel for Defendants First Funds LLC, Merchant Money Tree, Inc., and Reach Financial, LLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that all counsel of record who have consented to electronic service are being served a copy of this document via the court's CM/ECF system per Local Rule CV-5(a)(3) on this the 3rd day of October, 2006. Any other counsel of record will be served by first class mail on this same date.

/s/ Willem G. Schuurman
Willem G. Schuurman