

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

**ADVANCEME, INC.,**

**Plaintiff,**

v.

**RAPIDPAY LLC, FIRST FUNDS LLC,  
MERCHANT MONEY TREE, INC.,  
REACH FINANCIAL, LLC, and FAST  
TRANSACT, INC. d/b/a SIMPLE CASH,**

**Defendants.**

**CASE NO. 6:05-CV-424 (LED – JDL)**

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**ADVANCEME, INC.,**

**Plaintiff,**

v.

**AMERIMERCHANT, LLC,**

**Defendant.**

**CASE NO. 6:06-CV-082 (LED – JDL)**

**JURY TRIAL DEMANDED**

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**CONSENT MOTION FOR AN EXTENSION OF TIME TO  
FILE REPLY BRIEFS FOR DOCKET ENTRIES 262 AND 264**

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Plaintiff AdvanceMe, Inc. (“AdvanceMe”) and Defendants First Funds LLC, Reach Financial LLC, and Merchant Money Tree, Inc. (collectively, “Defendants”) respectfully submit their consent motion for an extension of time to file reply briefs for docket entries 262 and 264.

AdvanceMe respectfully requests an extension of time until Monday, June 18, 207 to file its Reply regarding Docket Entry 262. Defendants respectfully request an extension of time until Monday, June 18, 2007 to file their Reply regarding Docket Entry 264.

AdvanceMe and Defendants represent that the proposed extension is not sought for purposes of delay, but that justice might be done. Counsel for AdvanceMe and Defendants' met and conferred on June 11, 12, and 13, 2007 regarding the instant motion, and AdvanceMe and Defendants consented to its submission.

Date: June 13, 2007	Respectfully submitted,
By:	<u>/s/ Robert C. Matz</u>
	<p><b>PAUL, HASTINGS, JANOFSKY &amp; WALKER LLP</b>                  Ronald S. Lemieux (ronlemieux@paulhastings.com)                  (CA Bar No. 120822) (Admitted Pro Hac Vice)                  Michael N. Edelman (michaeledelman@paulhastings.com)                  (CA Bar No. 180948) (Admitted Pro Hac vice)                  Vidya R. Bhakar (vidbhakar@paulhastings.com)                  (CA Bar No. 220210) (Admitted Pro Hac Vice)                  Robert C. Matz (robertmatz@paulhastings.com)                  (CA Bar No. 217822) (Admitted Pro Hac Vice)                  Shanée Y. Williams (shaneewilliams@paulhastings.com)                  (CA Bar No. 221310) (Admitting Pro Hac Vice)                  Five Palo Alto Square, Sixth Floor                  Palo Alto, CA 94306-2155                  Telephone: 650.320.1800                  Facsimile: 650.320.1900</p>
	<p><b>IRELAND CARROLL &amp; KELLEY</b>                  Otis W. Carroll, Jr. (fedserve@icklaw.com)                  LEAD ATTORNEY                  State Bar No. 03895700                  Deborah J. Race (drace@icklaw.com)                  State Bar No. 16448700                  6101 S. Broadway, Suite 500                  Tyler, TX 75730                  Telephone: 903.561.1600                  Facsimile: 903.581.1071</p> <p>ATTORNEYS FOR PLAINTIFF ADVANCEME, INC.</p>

**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 pursuant to Local Rule cv-5(a)(3) on this the 13th day of June, 2007. Any other counsel of record will be served by first class mail on this same date.

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/s/ Robert C. Matz  
Robert C. Matz

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel of record for AdvanceMe and Defendants First Funds LLC, Reach Financial LLC, and Merchant Money Tree, Inc. met and conferred on June 11, 12, and 13, 2007 regarding this motion and have consented to its submission.

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