

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

ADVANCEME, INC.	§	
	§	
<i>Plaintiff</i>	§	
	§	CASE NO.. 6:05CV 424 LED
	§	
vs.	§	
	§	
RAPIDPAY, LLCSM	§	
	§	
<i>Defendant.</i>	§	NO JURY TRIAL DEMANDED

**UNOPPOSED MOTION BY DEFENDANT, RAPIDPAY, LLC. TO
EXTEND TIME TO FILE SUR-REPLY TO PLAINTIFF
ADVANCEME, INC.’S RESPONSE TO MOTION TO DISMISS
AND IN THE ALTERNATIVE, MOTION TO TRANSFER**

Defendant, Rapidpay, LLC (hereinafter “Rapidpay”) hereby moves for an order extending the time for Rapidpay to file its Sur-Reply to Plaintiff, Advanceme, Inc.’s Response to Motion to Dismiss and In the Alternative, Motion to Transfer.

Counsel for Rapidpay has conferred with counsel for Plaintiff, and Plaintiff has agreed to extend the time for Rapidpay to file its Sur-Reply to Plaintiff, Advanceme, Inc.’s Response to Motion to Dismiss and In the Alternative, Motion to Transfer.

This request for an extension is not sought for purposes of delay, but that justice might be done. Accordingly, Rapidpay requests that the Court extend the date on which Rapidpay’s sur-reply will be due to December 28, 2005.

For the convenience of the Court, a proposed Order is included.

Respectfully submitted,

/s/ Guy N. Harrison
Guy N. Harrison
Attorney at Law
State Bar No. 00000077
217 N. Center Street
P.O. Box 2845
Longview, Texas 75606
Tel: (903) 758-7361
Fax: (903) 753-9557
E-Mail: cj-gnharrison@att.net

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded via the Court's CM/ECF Filing System or via first class mail to each attorney/party of record on this 19th day of December, 2005.

/s/ Guy N. Harrison
Guy N. Harrison

CERTIFICATE OF CONFERENCE

Counsel for Defendant Rapidpay contacted counsel for Plaintiff, Otis W. Carroll, on December 19, 2005 and he stated that Plaintiff does not oppose this Motion.

/s/ Guy N. Harrison
Guy N. Harrison