

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

ADVANCEME, INC.,

*Plaintiff,*

v.

AMERIMERCHANT, LLC,

*Defendant.*

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CASE NO. 6:06-CV-082 (LED-JDL)

**JOINT MOTION TO AMEND THIS COURT'S JULY 5, 2006  
DOCKET CONTROL ORDER (DOCKET ENTRY 20)**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Plaintiff ADVANCEME, INC. and Defendant AMERIMERCHANT, LLC to bring this Joint Motion to amend the July 5, 2006 Docket Control Order (D.E. 20) as follows:

<b>CURRENT DEADLINE</b>	<b>REQUESTED DEADLINE</b>	<b>ACTION</b>
June 7, 2007	September 13, 2007	Parties with burden of proof designate expert witnesses (non-construction issues). Expert witness reports due. Refer to Local Rules for required information.
June 18, 2007	October 3, 2007	Parties designate responsive expert witnesses (non-construction issues). Expert witness reports due. Refer to Local Rules for required information.
	October 19, 2007	<b>Expert Witness Discovery Deadline.</b>

There is not currently a separate deadline for the close of expert discovery. Pursuant to the Court's July 5, 2006 Docket Control Order, both fact and expert discovery close on July 17,

2007. This Joint Motion does not request any amendment of the fact discovery cut-off; it only seeks to extend the expert disclosure deadlines and expert discovery cut-off as the parties agree that additional time is needed to complete the appropriate expert disclosures and expert discovery. Accordingly, the foregoing extensions are not sought for purposes of delay or any other improper purpose.

Respectfully submitted,

Date: June 5, 2007

By: /s/ Shanée Y. Williams  
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ATTORNEYS FOR PLAINTIFF ADVANCEME, INC.

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Plaintiff met and conferred with Joseph Gray, counsel for Defendants, and Defendants agreed to join in this Joint Motion to Amend this Court's July 5, 2006 Docket Control Order (Docket Entry 20).

*/s/ Shanée Y. Williams*

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Shanée Y. Williams

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by facsimile transmission and/or first class mail this 5th day of June, 2007.

*/s/ Shanée Y. Williams*

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Shanée Y. Williams