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

222222222

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.

ADVANCEME, INC.,

Plaintiff,

v.

AMERIMERCHANT, LLC,

Defendant.

**CASE NO. 6:05-CV-424 (LED – JDL)** 

CASE NO. 6:06-CV-082 (LED – JDL)

JURY TRIAL DEMANDED

## PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE OPPOSITION TO MOTION TO COMPEL IN EXCESS OF PAGE LIMIT

Plaintiff, AdvanceMe, Inc., requests this Court for leave to file its Opposition To Defendants' Motion To Compel in excess of the ten page limit. AdvanceMe, Inc. requests that this Court allow it to exceed the fifteen page limit by nine pages, excluding attachments. Plaintiff requests the additional pages because it has determined that the current length of the brief is necessary to best present its argument to the Court.

MOTION TO FILE IN EXCESS OF PAGE LIMIT RE ADVANCEME'S OPPOSITION TO DEFENDANTS' MOTION TO COMPEL

CASE NO.6:05-CV-424 CASE NO.6:06-CV-082

Therefore, AdvanceMe, Inc. respectfully requests that this Court grant it leave to file its Opposition To Defendants' Motion To Compel in excess of the page limits previously set by this Court. Counsel for AdvanceMe, Inc. has conferred with Joseph Gray, counsel for Defendants. Defendants have agreed to this motion. An Order reflecting same is attached for the Court's convenience.

Respectfully submitted,

DATED: November 28, 2006

By: \_\_\_\_\_/s/ Robert C. Matz PAUL, HASTINGS, JANOFSKY & WALKER LLP Ronald S. Lemieux (CA Bar No. 120822) (Admitted Pro Hac Vice) Michael N. Edelman (CA Bar No. 180948) (Admitted Pro Hac Vice) Vidya R. Bhakar (CA Bar No. 220210) (Admitted Pro Hac Vice) Robert C. Matz (CA Bar No. 217822) (Admitted Pro Hac Vice) Shanée Y. Williams (CA Bar No. 221319) (Admitted Pro Hac Vice)

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ATTORNEYS FOR PLAINTIFF ADVANCEME, INC.

## **CERTIFICATE OF CONFERENCE**

The undersigned counsel for AdvanceMe, Inc. has conferred with Joseph Gray, counsel for Defendants. Defendants have agreed to this motion.

> /s/Robert C. Matz

## **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 28th day of November, 2006. Any other counsel of record will be served by first class mail on this same date.

> /s/ Rose Jones-Shine