

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

MIRROR WORLDS, LLC

Plaintiff,

v.

APPLE, INC.

Defendant.

Civil Action No. 6:08-CV-88 LED

JURY TRIAL DEMANDED

APPLE, INC.

Counterclaim Plaintiff

v.

MIRROR WORLDS, LLC,  
MIRROR WORLDS TECHNOLOGIES,  
INC.

Counterclaim Defendants.

**JOINT MOTION TO EXTEND DEADLINES FOR THE PARTIES  
TO COMPLY WITH P.R. 4-3(d), 4-4, 4-5(a), 4-5(b) AND TO FILE ANY  
MOTIONS FOR SUMMARY JUDGMENT OF INDEFINITENESS**

Mirror Worlds, LLC (“Mirror Worlds”), Mirror Worlds Technologies, Inc. (“MWT”), and Apple Inc. (“Apple”) (collectively, “the parties”) hereby move to (a) extend the deadline to comply with Patent Local Rule 4-3(d) to Friday, November 27, 2009, (b) extend the discovery deadline for claim construction issues under P.R. 4-4 to Monday, December 21, 2009, (c) extend the deadline to comply with Patent Local Rule 4-5(a) to Monday, December 7, 2009, (d) extend the deadline to comply with Patent Local Rule 4-5(b) to Tuesday, December 22, 2009, and (e) extend the deadline to file any motions for summary judgment of indefiniteness to Tuesday,

December 22, 2009. Good cause exists for the requested relief, namely, that the additional time is needed to complete the depositions of the parties' experts regarding claim construction.

The parties' present deadline to comply with (a) Patent Local Rule 4-3(d) is Wednesday, November 25, 2009, (b) Patent Local Rule 4-4 is Thursday, December 17, 2009, (c) Patent Local Rule 4-5(a) is Thursday, December 3, 2009, and (d) Patent Local Rule 4-5(b) is Friday, December 18, 2009. The present deadline to file any motions for summary judgment of indefiniteness is Friday, December 18, 2009

Accordingly, the parties respectfully request the Court to (a) extend the deadline to comply with Patent Local Rule 4-3(d) to Friday, November 27, 2009, (b) extend the discovery deadline for claim construction issues under P.R. 4-4 to Monday, December 21, 2009, for the limited purpose of completing the depositions of the parties' experts regarding claim construction, (c) extend the deadline to comply with Patent Local Rule 4-5(a) to Monday, December 7, 2009, (d) extend the deadline to comply with Patent Local Rule 4-5(b) to Tuesday, December 22, 2009, and (e) extend the deadline to file any motions for summary judgment of indefiniteness to Tuesday, December 22, 2009. This extension is not sought for the purpose of delay, but instead so that justice may be served.

A proposed order granting the parties' motion for extension is attached hereto.

Dated: November 25, 2009

/s/ Richard H. An

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Respectfully submitted,

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**APPLE INC.**

**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 this 25th day of November, 2009, via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Richard H. An