

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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.

**APPLE INC.'S UNOPPOSED MOTION FOR ADDITIONAL TIME
TO RESPOND TO DOCKET NOS. 206, 215, 231, AND 232**

Apple Inc. ("Apple") respectfully submits this Unopposed Motion for Additional Time To Respond to the following:

1) Mirror Worlds Technologies, Inc.'s Motion for Leave To Amend Its Answer and Submit Invalidity Contentions. (Doc. No. 215.) The time to respond to this Motion has been extended to July 20, 2010 by the Court's Order filed July 16, 2010. (Doc. No. 242.) Apple respectfully requests that the Court grant it one week, until July 27, 2010, to file its response, if necessary.

2) Mirror Worlds, LLC's Motion To Compel Production of Foreign Sales Information, the Master Disk, and Information Regarding the iPad. (Doc. No. 206.) The time to respond to this Motion has been extended to July 20, 2010 by the Court's Order filed July 16, 2010. (Doc. No. 242.) Apple respectfully requests that the Court grant it one week, until July 27, 2010, to file its response, if necessary.

3) Mirror Worlds, LLC and Mirror Worlds Technologies, Inc.'s Opposition to Apple Inc's Motion To Compel Documents and Interrogatory Responses. (Doc. Nos. 204, 231.) The time to respond to this Opposition has been extended to July 20, 2010 by the Court's Order filed July 16, 2010. (Doc. No. 242.) Apple respectfully requests that the Court grant it one week, until July 27, 2010, to file its reply brief, if necessary.

4) Mirror Worlds Technologies, Inc.'s Response to Defendant/Counterclaim Plaintiff Apple Inc's Motion To Strike the Surprise Expert Reports of John Levy, Ph.D. on the Purported Invalidity and Non-Infringement of U.S. Patent No. 6,613,101. (Doc. Nos. 205, 232.) The time to respond to this Opposition has been extended to July 20, 2010 by the Court's Order filed July 16, 2010. (Doc. No. 242.) Apple respectfully requests that the Court grant it one week, until July 27, 2010, to file its reply brief, if necessary.

As noted in Apple's previous Unopposed Motion for Additional Time (Doc. No. 241), during the additional time period already granted by the Court, the parties have successfully resolved a significant number of the issues raised in the above motions. With regard to Mirror Worlds, LLC's Motion To Compel Production of Foreign Sales Information, the Master Disk, and Information Regarding the iPad, the parties have resolved the issues relating to Mirror Worlds, LLC's requests for foreign sales information, a copy of the Master Disk, and information regarding the iPad. With regard to Apple Inc's Motion To Compel Documents and

Interrogatory Responses, the parties have resolved the issues relating to Apple's requests for documents relating to the government funding of Lifestreams, TR 1054, and third-party software utilized by Lifestreams and Scopeware as well as Apple's request for supplemental interrogatory responses from Mirror Worlds LLC.

Prior to Apple's July 15, 2010 Unopposed Motion For Additional Time, Apple made proposals to Mirror Worlds, LLC ("Mirror Worlds") and Mirror Worlds Technologies, Inc. ("MWT") to attempt to resolve all outstanding issues in the above motions. While Mirror Worlds and MWT have indicated that they are optimistic that all outstanding issues can be resolved without involving the Court, they have requested more time to consider Apple's proposals. As a result, Apple submits this Motion for Additional Time in the interest of narrowing or eliminating the remaining issues for the Court.

This Motion for Additional Time is unopposed. On July 19, 2010, Alexander Solo, counsel for Mirror Worlds and MWT, contacted counsel for Apple and proposed the requested one-week extension for the above responses. On July 20, 2010, counsel for Apple, Mirror Worlds, and MWT met and conferred telephonically and agreed to continue to attempt to resolve the outstanding issues. A proposed order is attached.

Dated: July 20, 2010

Respectfully submitted,

/s/ Jeffrey G. Randall

Jeffrey G. Randall

Lead Attorney

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COUNSEL FOR APPLE INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on this 20th day of July, 2010. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Jeffrey G. Randall
Jeffrey G. Randall