UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

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

JURY TRIAL DEMANDED

MIRROR WORLDS, LLC

Plaintiff,

v.

APPLE, INC.

Defendant.

APPLE, INC.

Counterclaim Plaintiff,

v.

MIRROR WORLDS, LLC, MIRROR WORLDS, TECHNOLOGIES, INC.

Counterclaim Defendants.

MIRROR WORLDS UNOPPOSED MOTION FOR ADDITIONAL TIME TO RESPOND TO DOCKET NOS. 220, 221, 223, 224, 225, AND 226 AND CORRESPONDING EXTENSION FOR APPLE INC TO RESPOND TO DOCKET NOS. 227, 228, AND 229

Mirror Worlds, LLC ("Mirror Worlds") and Mirror Worlds Technologies, Inc. ("MWT) respectfully submit this Unopposed Motion for Additional Time (one day) to respond to the following:

1) Sealed Motion Under Daubert And Rule 26 To Limit The Testimony And Expert

Reports Of John Levy. (D.I. 220)

2) Motion For Summary Judgment That The Asserted Claims Of U.S. Patent Nos.

6,006,227, 6,638,313, 6,725,427 And 6,768,999 Are Invalid As Anticipated And Obvious. (D.I.

221).

3) Sealed Motion For Partial Summary Judgment Of Inequitable Conduct Regarding Inventorship Of The '227 Patent. (D.I. 223).

 Sealed Motion For Partial Summary Judgment To Establish Non-Infringement Of Apple's Foreign Products And Exclude Foreign Sales From Any Potential Damages Award. (D.I. 224).

5) Sealed Motion For Summary Judgment Of Noninfringement Of U.S. Patent Nos. 6,006,227; 6,638,313; 6,725,427; And 6,768,999. (D.I. 225).

6) Sealed Motion For Partial Summary Judgment Dismissing Mirror Worlds' Allegations Of Willful Infringement. (D.I. 226)

Mirror Worlds respectfully requests that the Court grant a similar extension to Apple Inc. to respond to the following:

7) Sealed Motion Under Daubert To Strike Portions Of The Rebuttal Expert Report Of Keith R. Ugone, Ph.D. And To Exclude Ugone's Testimony (D.I. 227).

8) Sealed Motion Mirror Worlds, LLC's Motion For Summary Judgment Of No Inequitable Conduct By Mirror Worlds, LLC. (D.I. 228).

Motion For Summary Judgment Of Invalidity Of US Patent No. 6,613,101. (D.I.
229).

This Motion for Additional Time is unopposed. On July 21, 2010, Alexander Solo, counsel for Mirror Worlds and MWT, contacted counsel for Apple and proposed the requested

one day extension for the above responses. On July 21, 2010, counsel for Apple Inc., Mirror Worlds, and MWT met and conferred telephonically and agreed to the extension.

This extension is sought due to unforeseen circumstances and not for purposes of delay.

Dated: July 21, 2010

Respectfully submitted, By: <u>/s/ Alexander Solo</u> Otis Carroll, *Lead Counsel* (Texas States Bar No. 03895700) Deborah Race (Texas State Bar No. 16448700) IRELAND CARROLL & KELLEY, P.C. 6101 S. Broadway, Suite 500 Tyler, Texas 75703 Tel: (903) 561-1600 Fax: (903) 581-1071 Email: Fedserv@icklaw.com

Joseph Diamante (*Pro Hac Vice*) Kenneth L. Stein (*Pro Hac Vice*) Ian G. DiBernardo (*Pro Hac Vice*) Alexander Solo (*Pro Hac Vice*) STROOCK & STROOCK & LAVAN LLP 180 Maiden Lane New York, N.Y. 10038 Tel: (212) 806-5400 Fax: (212) 806-6006 Email: <u>kstein@stroock.com</u> ATTORNEYS FOR MIRROR WORLDS, LLC AND MIRROR WORLDS TECHNOLOGIES, INC.

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Mirror Worlds and MWT has satisfied the "meet and confer" requirements of Local Rule CV-7(h), and that counsel of record in this matter are not opposed to the relief sought in this Motion.

<u>/s/ Alexander Solo</u> Alexander Solo

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 21st day of July, 2010, via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alexander Solo