

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

<b>ALOFT MEDIA, LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	<b>Civil Action No. 6:08-CV-440</b>
<b>v.</b>	§	
	§	
<b>GOOGLE, INC.</b>	§	<b>JURY TRIAL DEMANDED</b>
	§	
<b>Defendant.</b>	§	

**PLAINTIFF ALOFT MEDIA, LLC’S OPPOSED  
MOTION TO SUSPEND DEADLINES**

Aloft Media, LLC (“Aloft”), plaintiff in the above-entitled and numbered civil action, respectfully requests that the Court enter an Order suspending all deadlines in this case for a period of two weeks. Google Inc. refuses to agree to this motion; instead, it only will agree to address deadlines on a case by case basis. The parties reached an oral agreement to settle this case and have been negotiating the final written settlement agreement. This two weeks is necessary because Aloft just received a revised settlement agreement from Google Inc. today, and, the additional time is necessary to attempt to finalize the settlement agreement, and, if they cannot, to undertake the necessary work to comply with the requirements of the Docket Control and Discovery Orders.

WHEREFORE, PREMISES CONSIDERED, Aloft respectfully moves that the Court grant this Opposed Motion to Suspend Deadlines as set forth in the attached proposed order.

Respectfully submitted,



Eric M. Albritton  
Texas State Bar No. 00790215  
Adam A. Biggs  
Texas State Bar No. 24051753  
ALBRITTON LAW FIRM  
P.O. Box 2649  
Longview, Texas 75606  
(903) 757-8449 (phone)  
(903) 758-7397 (fax)  
ema@emafirm.com  
aab@emafirm.com


T. John Ward, Jr.  
Texas Bar No. 00794818  
WARD & SMITH LAW FIRM  
P.O. Box 1231  
Longview, TX 75606-1231  
Telephone: (903) 757-6400  
Facsimile: (903) 757-2323  
jw@jwfirm.com

Danny L. Williams  
Texas State Bar No. 21518050  
Matthew R. Rodgers  
Texas Bar No. 24041804  
Chris Cravey  
Texas State Bar No. 24034398  
WILLIAMS, MORGAN &  
AMERSON, P.C.  
10333 Richmond, Suite 1100  
Houston, Texas 77042  
Telephone: (713)934-4060  
Facsimile: (713) 934-7011  
danny@wmalaw.com  
cravey@wmalaw.com  
mrodgers@wmalaw.com

*ATTORNEYS FOR PLAINTIFF  
ALOFT MEDIA, LLC*


**CERTIFICATE OF CONFERENCE**

Counsel for defendants were consulted regarding this motion and advised that they are opposed to the relief sought by this motion.

  
Eric M. Albritton

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 20th day of August, 2009.

  
Eric M. Albritton