

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

**BEDROCK COMPUTER  
TECHNOLOGIES LLC,**

**Plaintiff,**

**v.**

**SOFTLAYER TECHNOLOGIES, INC.,  
et al.**

**Defendants.**

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**CASE NO. 6:09-cv-269**

**Jury Trial Demanded**

**BEDROCK’S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Plaintiff Bedrock Computer Technologies LLC (“Bedrock”) respectfully requests that the Court grant Bedrock an extension of time to file its “proof in the form of declarations or affidavits to support their assertions of privilege, along with the documents over which privilege is asserted for in camera inspection,” pursuant to Paragraph 6 of the Discovery Order (Dkt. 173), dated February 3, 2010, in connection with Defendants’ Motion to Compel Testimony and Documents from Mikhail Lotvin and Bedrock, and Request for *In Camera* Review of Documents on Bedrock’s Privilege Log (“Motion to Compel”) (Dkt. No. 263).

Defendants filed their Motion to Compel on August 9, 2010. Bedrock’s deadline to file its proof, as required by Paragraph 6 of the Discovery Order, is currently due on September 9, 2010. To accommodate attorney schedules and not for the purpose of delay, Bedrock respectfully requests a one-week extension, which would move the September 9th deadline to September 16, 2010, for Bedrock to submit proof supporting Bedrock’s claims of privilege and work product. The defendants do not oppose this request.

DATED: September 9, 2010

Respectfully submitted,  
**McKOOL SMITH, P.C.**

/s/ Douglas A. Cawley

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**ATTORNEYS FOR PLAINTIFF  
BEDROCK COMPUTER  
TECHNOLOGIES LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 9, 2010, true and correct copies of the foregoing document were filed via CM/ECF, and were thereby made available to all counsel of record.

/s/ J. Austin Curry  
J. Austin Curry

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff has conferred with Counsel for Defendants, and Defendants do not oppose the relief requested in this Motion.

/s/ J. Austin Curry  
J. Austin Curry