

3. On September 9, 2010, Plaintiff filed an Unopposed Motion for Extension of Time for a one week extension to submit proof supporting Bedrock's claim of privilege and work product through September 16, 2010.

4. Defendants' Reply is currently due on September 13, 2010. By this Motion, Defendants seek an extension to and including September 20, 2010, in which to file their Reply to Plaintiff's Response to Defendants' Motion to Compel. Defendants seek this extension to allow them to address in their reply any proof submitted by Bedrock on September 16, 2010 to support its claim of privilege and work product.

5. Plaintiff does not oppose this extension.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that the Court grant this Unopposed Motion for Extension of Time by extending the time period for Defendants to file their Reply in support of their Motion to Compel Non-Privileged Testimony and Documents from Mikhail Lotvin and Bedrock and Request for *In Camera* Review of Non-Privileged Documents on Bedrock's Privilege Log up to and including September 20, 2010.

Dated: September 13, 2010

Respectfully submitted,

By: /s/ Michael E. Jones

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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 via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 13, 2010. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Michael E. Jones