## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

BEDROCK COMPUTER TECHNOLOGIES LLC,	) ) ) CASE NO. 6:09–CV–00269
Plaintiff,	) Hon. Leonard E. Davis
v.	)
SOFTLAYER TECHNOLOGIES, INC., et al.,	) ) )
Defendants.	) JURY TRIAL DEMANDED )

UNOPPOSED MOTION FOR EXTENSION OF TIME 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

COME NOW, Defendants Google Inc., Match.com, LLC, MySpace, Inc., AOL Inc., and Yahoo! Inc. ("Defendants") and file this Unopposed Motion for Extension of Time 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, and would respectfully show the Court as follows:

- 1. On August 9, 2010, Defendants filed their Motion to Compel [Dkt. #263].
- On September 3, 2010, Plaintiff filed its Response in Opposition to Defendants'
   Motion to Compel, [Dkt. #277].

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 20, 2010 pursuant to the Court's

September 15, 2010 Order. By this Motion, Defendants seek an additional extension to and

including September 22, 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 22, 2010.

Dated: September 20, 2010

Respectfully submitted,

By: /s/ Michael E. Jones

Michael E. Jones

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## /s/ Yar Chaikovsky

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Attorneys for Defendants MySpace, Inc. and AOL LLC.

## **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 20, 2010. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Michael E. Jones