

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

BEDROCK COMPUTER)
TECHNOLOGIES LLC,)

Plaintiff,)

v.)

SOFTLAYER TECHNOLOGIES, INC.,)
CITIWARE TECHNOLOGY SOLUTIONS,)
LLC, GOOGLE INC., YAHOO! INC.,)
MYSPACE INC., AMAZON.COM INC.,)
PAYPAL INC., MATCH.COM, LLC., AOL)
LLC, and CME GROUP INC.,)

Defendants.)

CASE NO. 6:09-CV-00269

Hon. Leonard E. Davis

JURY TRIAL DEMANDED

**GOOGLE INC.’S UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINE FOR
THREE FACT WITNESS DEPOSITIONS**

Defendant Google Inc. (“Defendant”) files this Motion to Extend Discovery Deadline for Three Fact Witness Depositions, and would respectfully show the Court the following.

The deadline for the completion of discovery in the above-referenced cause was January 10, 2011 [DKT #341]. Defendant respectfully requests that the deadline be extended to March 30, 2011 for the sole purpose of conducting the depositions of the following fact witnesses:

- Laurent Chavey: March 29, 2011 (the Court ordered Defendant Google to produce Mr. Chavey for an additional three hours of deposition testimony by order of March 4, 2011 [DKT #548])
- Lucas Pereira: March 29, 2011
- Michael Waychison: March 30, 2011

Plaintiff Bedrock Computer Technologies, LLC does not oppose the relief sought by this motion. This extension of time is needed to accommodate the schedules of all parties. The

granting of this motion will not change any other deadline set forth in the Court's Docket Control Orders.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Motion be granted, and that the deadline for the completion of discovery be extended to and including March 30, 2011 for the sole purpose of conducting the depositions of the three identified fact witnesses. All other case deadlines would remain unchanged.

March 23, 2011

Respectfully submitted,

/s/ Evette D. Pennypacker, with permission by
Michael E. Jones

Claude M. Stern
claudestern@quinnemanuel.com
Todd M. Briggs
toddbriggs@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
555 Twin Dolphin Dr., Suite 560
Redwood Shores, CA 94065
Telephone: 650-801-5000
Facsimile: 650-801-5100

Michael E. Jones
State Bar No. 10929400
mikejones@potterminton.com
POTTER MINTON
110 N. College
Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

*Attorneys for Defendants Google Inc. and
Match.com, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 23, 2011.

By: /s/ Michael E. Jones
Michael E. Jones