

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

EOLAS TECHNOLOGIES, INC.

Plaintiff,

v.

ADOBE SYSTEMS, INC. ET AL.,

Defendants.

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CIVIL ACTION NO. 6:09-CV-446 (LED)

UNOPPOSED MOTION TO AMEND CERTAIN PRETRIAL DEADLINES

Defendants Adobe Systems, Inc., Amazon.com, Inc., CDW LLC, Citigroup Inc., The Go Daddy Group, Inc., Google, Inc., J.C. Penney Corp., Inc., Staples, Inc., Yahoo! Inc., and YouTube LLC (collectively the “Defendants”) respectfully move to amend certain pretrial deadlines in the September 15, 2011 Docket Control Order, Dkt. No. 979.

Ten defendants currently remain in this lawsuit. Defendants request additional time to complete certain pretrial disclosures so they may further coordinate as a group in an attempt to streamline the required disclosures. The parties have conferred regarding the requested relief and none are opposed. This motion is not made for delay and should not impact any other deadline applicable to this case.

For all these reasons, the Defendants respectfully request that the Court extend the following pretrial deadlines:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Video and Stenographic Deposition Designations due. Each party who proposes to offer deposition testimony shall file a disclosure identifying the line and page numbers to be offered.	December 21, 2011	January 5, 2011
Parties to exchange exhibit lists in .doc or .xls format.	December 21, 2011	January 5, 2011
Parties to identify any issues to be tried to the bench.	December 21, 2011	January 5, 2011
Parties exchange electronic copies of numbered trial exhibits.	January 5, 2011	January 12, 2011
Rebuttal Designations and Objections to Deposition Testimony due. Cross examination line and page numbers to be included. In video depositions, each party is responsible for preparation of the final edited video in accordance with their parties' designations and the Court's ruling on objections.	January 5, 2011	January 12, 2011
Proposed Findings of Fact and Conclusions of Law with citation to authority for issues tried to the bench.	January 12, 2011	January 19, 2011
Objections to exhibits due.	January 12, 2011	January 19, 2011
Objections to Rebuttal Deposition Testimony due.	January 12, 2011	January 19, 2011

Respectfully submitted,

/s/ Jennifer H. Doan

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). 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 certified mail, return receipt requested, on this the 16th day of December, 2011.

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