

The parties have met and conferred and this Motion is unopposed. This Motion is not made for delay and should not impact any other deadline applicable to this case. Accordingly, the Defendants respectfully move the Court for an Order allowing Defendants to exceed the Court's standing order limitation on deposition designations, as described above, and extending the deadline for Plaintiffs' objections and counter-designations to January 25, 2012 and the deadline for Defendants' rebuttals until January 30, 2012.

Respectfully submitted,

/s/ Joshua R. Thane

Jennifer H. Doan (TX Bar No. 08809050)

Joshua R. Thane (TX Bar No. 24060713)

HALTOM & DOAN

6500 Summerhill Road, Suite 100

Texarkana, TX 75503

Telephone: (903) 255-1000

Facsimile: (903) 255-0800

Email: jdoan@haltomdoan.com

Email: jthane@haltomdoan.com

Edward R. Reines

Jared B. Bobrow

Sonal N. Mehta

Aaron Y. Huang

Andrew L. Perito

WEIL, GOTSHAL & MANGES LLP

201 Redwood Shores Parkway

Redwood Shores, CA 94065

Telephone: (650) 802-3000

Facsimile: (650) 802-3100

Email: edward.reines@weil.com

Email: jared.bobrow@weil.com

Email: sonal.mehta@weil.com

Email: aaron.huang@weil.com

Email: andrew.perito@weil.com

Doug W. McClellan

WEIL, GOTSHAL & MANGES LLP

700 Louisiana, Suite 1600

Houston, TX 77002

Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: doug.mcclellan@weil.com

Otis Carroll (TX Bar No. 3895700)
Deborah Race (TX Bar No. 11648700)
IRELAND, CARROLL & KELLEY, P.C.
6101 South Broadway, Suite 500
Tyler, Texas 75703
Telephone: (903) 561-1600
Facsimile: (903) 581-1071
Email: fedserv@ickl.com

**ATTORNEYS FOR DEFENDANT
AMAZON.COM, INC. AND
YAHOO! INC.**

/s/ Thomas L. Duston (with permission)
Thomas L. Duston
tduston@marshallip.com
Anthony S. Gabrielson
agabrielson@marshallip.com
Scott A. Sanderson
ssanderson@marshallip.com
MARSHALL, GERSTEIN & BORUN LLP
6300 Willis Tower
233 South Wacker Drive
Chicago, IL 60606-6357
(312) 474-6300

Brian Craft
bcraft@findlaycraft.com
Eric H. Findlay
efindlay@findlaycraft.com
FINDLAY CRAFT, LLP
6760 Old Jacksonville Highway, Suite 101
Tyler, TX 75703
(903) 534-1100

**ATTORNEYS FOR DEFENDANT
CDW LLC**

/s/ Christopher M. Joe (with permission)

Christopher M. Joe
chris.joe@bjciplaw.com
Eric W. Buether
eric.buether@bjciplaw.com
Niky Bukovcan
niky.bukovcan@bjciplaw.com
1700 Pacific, Suite 2390
Dallas, Texas 75201
Telephone: (214) 466-1272
Facsimile: (214) 635-1828

**ATTORNEYS FOR DEFENDANT
J.C. PENNEY CORPORATION, INC.**

/s/ Mark Matuschak (with permission)

Joe W. Redden, Jr.
Michael Ernest Richardson
BECK REDDEN & SECREST
1221 McKinney
Suite 4500
Houston, TX 77010
713.951.6284
jredden@brsfirm.com
mrichardson@brsfirm.com

Mark G. Matuschak
Donald R. Steinberg
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, MA 02109
617.526.5000
mark.matuschak@wilmerhale.com
don.steinberg@wilmerhale.com

Kate Hutchins
WILMER CUTLER PICKERING HALE
AND DORR LLP
399 Park Avenue
New York, NY 10022
212.230.8800
kate.hutchins@wilmerhale.com

Daniel V. Williams
WILMER CUTLER PICKERING HALE
AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
202.663.6012
daniel.williams@wilmerhale.com

**ATTORNEYS FOR DEFENDANT
STAPLES, INC.**

/s/ Neil J. McNabnay (with permission)

Thomas M. Melsheimer (txm@fr.com)
Texas Bar No. 13922550
Neil J. McNabnay (njm@fr.com)
Texas Bar No. 24002583
FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
(214) 747-5070 (Telephone)
(214) 747-2091 (Facsimile)

Proshanto Mukherji
E-mail: pvm@fr.com
FISH & RICHARDSON P.C.
One Marina Park Drive
Boston, MA 02110-1878
617-542-5070 (Telephone)
617-542-8906 (Facsimile)

**ATTORNEYS FOR DEFENDANT
THE GO DADDY GROUP, INC.**

/s/ M. Scott Fuller (with permission)

Edwin R. DeYoung
Texas Bar No. 05673000
Roy W. Hardin
Texas Bar No. 08968300
Roger Brian Cowie
Texas Bar No. 00783886
M. Scott Fuller
Texas Bar No. 24036607
Galyn Gafford

Texas Bar No. 24040938
LOCKE LORD LLP
2200 Ross Avenue, Suite 2200
Dallas, Texas 75201-6776
Telephone: (214) 740-8000
Facsimile: (214) 740-8800
E-mail: edeyoung@lockelord.com

**ATTORNEYS FOR DEFENDANT
CITIGROUP INC.**

/s/ David J. Healey (with permission)

David J. Healey
E-mail: Healey@fr.com
FISH & RICHARDSON P.C.
1 Houston Center
1221 McKinney Street, Suite 2800
Houston, TX 77010
713-654-5300 (Telephone)
713-652-0109 (Facsimile)

OF COUNSEL:

Frank E. Scherkenbach
E-mail: Scherkenbach@fr.com
FISH & RICHARDSON P.C.
225 Franklin Street
Boston, MA 02110-2804
617-542-5070 (Telephone)
617-542-8906 (Facsimile)

Joseph P. Reid
E-mail: Reid@fr.com
Jason W. Wolff
E-mail: Wolff@fr.com
FISH & RICHARDSON P.C.
12390 El Camino Real
San Diego, CA 92130
858-678-5070 (Telephone)
858-678-5099 (Facsimile)

**ATTORNEYS FOR DEFENDANT
ADOBE SYSTEMS INCORPORATED**

/s/ Doug E. Lumish (with permission)

Douglas E. Lumish (pro hac vice)
dlumish@kasowitz.com
Jeffrey G. Homrig (pro hac vice)
jhomrig@kasowitz.com
Jonathan K. Waldrop (pro hac vice)
jwaldrop@kasowitz.com
Joseph H. Lee (pro hac vice)
jlee@kasowitz.com
Parker C. Ankrum (pro hac vice)
pankrum@kasowitz.com
KASOWITZ, BENSON, TORRES &
FRIEDMAN, LLP
1360 Peachtree St., N.E., Suite 1150
Atlanta, GA 30309
Tel: (404) 260-6080
Fax: (404) 260-6081

James R. Batchelder (pro hac vice)
james.batchelder@ropesgray.com
Sasha G. Rao (pro hac vice)
sasha.rao@ropesgray.com
Mark D. Rowland
mark.rowland@ropesgray.com
Brandon Stroy (pro hac vice)
brandon.stroy@ropesgray.com
Lauren Robinson (pro hac vice)
lauren.robinson@ropesgray.com
Rebecca R. Hermes (pro hac vice)
rebecca.wight@ropesgray.com
Han Xu (pro hac vice)
han.xu@ropesgray.com
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, California 94303-2284
Telephone: (650) 617-4000
Facsimile: (650) 617-4090

Michael E. Jones (Bar No. 10929400)
mikejones@potterminton.com
Allen F. Gardner (Bar No. 24043679)
allengardner@potterminton.com
POTTER MINTON
A Professional Corporation
110 N. College, Suite 500
Tyler, TX 75702

Telephone: (903) 597-8311
Facsimile: (903) 593-0846

**ATTORNEYS FOR DEFENDANTS
GOOGLE, INC. AND YOUTUBE, LLC**

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 18th day of January, 2012.

/s/ Joshua R. Thane _____
Joshua R. Thane