

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

EOLAS TECHNOLOGIES, INC.,

Plaintiff,

vs.

ADOBE SYSTEMS, INC., ET AL.,

Defendants.

Civil Action No. 6:09-cv-446-LED

AND RELATED COUNTERCLAIMS

**DEFENDANT APPLE INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
COMPLETE ROLLING DOCUMENT PRODUCTION PURSUANT TO ¶ 2(B) OF THE
JOINT AGREED DISCOVERY ORDER**

Defendant Apple Inc. (“Apple”) respectfully moves the Court to extend the deadline for Apple to complete its rolling document production pursuant to Paragraph 2(B) of the Joint Agreed Discovery Order [Docket No. 247] from August 4, 2010 until September 29, 2010, and would show the Court as follows:

I.

Pursuant to the Joint Agreed Discovery Order entered by this Court on April 2, 2010 [Docket No. 247], the deadline for the parties to complete their Paragraph 2(B) rolling document productions is August 4, 2010. Apple has been working diligently to meet this date but, despite its efforts, seeks additional time to complete its production. The parties have met and conferred and this Motion is **unopposed**. Plaintiff Eolas Technologies, Inc. (“Eolas”) has agreed that Apple may extend the August 4, 2010 deadline by eight weeks, or until September 29, 2010.

This additional eight week extension will ensure that Apple has sufficient time to complete its obligations under ¶ 2(B) of the Joint Agreed Discovery Order.

II.

This motion is not made for delay, and should not impact any other deadline applicable to this litigation.

III.

Accordingly, Apple respectfully requests that the Court grant this unopposed Motion and extend the deadline for Apple to complete its Paragraph 2(B) rolling document production pursuant to the Joint Agreed Discovery Order [Docket No. 247] from August 4, 2010 until September 29, 2010.

Dated: June 23, 2010

/s/Teague I. Donahey

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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). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d), 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 email, on this the 23rd day of June, 2010.

/s/Duy D. Nguyen

CERTIFICATE OF CONFERENCE

I hereby certify that on June 18, 2010, Josh Budwin, counsel for Eolas Technologies Inc., informed me that Eolas has no opposition to this Motion for Extension.

/s/Teague I. Donahey