

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

EOLAS TECHNOLOGIES INCORPORATED,

Plaintiff,

v.

ADOBE SYSTEMS INC., ET AL,

Defendants.

CASE NO. 6:09-cv-446

Hon. Leonard E. Davis

JURY

**UNOPPOSED MOTION OF JP MORGAN CHASE & CO.
FOR EXTENSION OF TIME TO COMPLETE CERTAIN DISCOVERY**

Defendant JPMorgan Chase & Co. (JPMorgan or Defendant), by its undersigned counsel respectfully moves the Court to extend (i) their deadline for rolling document production from September 29, 2010 (Dkt. 381) until October 22, 2010, and (ii) their deadline for the exchange of privilege logs from October 16, 2010 (Dkt. 381) until November 9, 2010.

JPMorgan has been producing documents to Plaintiff on a rolling basis and will continue to produce documents to Plaintiff on a rolling basis. As part of JPMorgan's production, it is searching across the company's service lines and various sub-groups to identify potentially responsive materials. JPMorgan has recently become aware of additional sources of potentially responsive documents requires additional time to properly search these sources and process documents for production. In the interim, JPMorgan will continue to produce responsive

documents to Eolas on a rolling basis. The parties have met and conferred, and agreed that JPMorgan should endeavor to complete its rolling document production by October 22, 2010 and exchange privilege logs by November 9, 2010. As such, this motion is unopposed.

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

Accordingly, JPMorgan respectfully moves the Court for an Order extending the deadline for Defendant JPMorgan to complete its rolling document production pursuant to Paragraph 2(b) of the *Joint Agreed Discovery Order* (Dkt. 247) until October 22, 2010 and to exchange their privilege logs pursuant to the *Docket Control Order* (Dkt. 249) until November 9, 2010.

Dated: September 27, 2010

Respectfully Submitted,

/s/ Debby E. Gunter

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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 this **UNOPPOSED MOTION OF JP MORGAN CHASE & CO FOR EXTENSION OF TIME TO COMPLETE CERTAIN DISCOVERY** via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 27th day of September 2010. Any other counsel of record will be served via First Class U.S. Mail on this same date.

/s/ Debby Gunter

Debby Gunter