

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

Eolas Technologies Incorporated,

Plaintiff

v.

Adobe Systems Inc., Amazon.com, Inc.
Apple Inc., Argosy Publishing, Inc.,
Blockbuster Inc., CDW Corp.,
Citigroup Inc., eBay Inc., Frito-Lay, Inc.,
The Go Daddy Group, Inc., Google Inc.,
J.C. Penney Company, Inc., JPMorgan
Chase & Co., New Frontier Media, Inc.,
Office Depot, Inc., Perot Systems Corp.,
Playboy Enterprises International, Inc.,
Rent-A-Center, Inc., Staples, Inc., Sun
Microsystems Inc., Texas Instruments Inc.,
Yahoo! Inc., and YouTube, LLC,

Defendants.

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Civil Action No. 6:09-cv-00446-LED

**UNOPOSED MOTION FOR EXTENSION OF TIME FOR FRITO-LAY, INC.
AND RENT-A-CENTER, INC. TO COMPLETE CERTAIN DISCOVERY**

Defendants Frito-Lay, Inc. and Rent-A-Center, Inc. (collectively “Defendants”) hereby move the Court for an extension of time to complete certain discovery. The parties have met and conferred regarding the relief requested herein and this motion is unopposed.

The deadlines for the parties to conclude document production and exchange privilege logs are currently set for September 29, 2010 and October 16, 2010, respectively (Dkt No. 381). The parties have met and conferred and agreed that the deadlines for completion of Defendants’ document productions and service of a privilege logs, if any, should be extended to October 13, 2010 and November 1, 2010, respectively. Defendants have been diligently searching for responsive documents. In this regard,

Defendants are using, *inter alia*, search logic recently negotiated with Plaintiff to comb through material collected from custodians and to identify documents for production. Defendants are producing this material on a rolling basis as quickly as reasonably possible, will continue to do so, and have reached an understanding with Plaintiff that additional time is required to complete Defendants' productions.

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

Accordingly, Frito-Lay, Inc. and Rent-A-Center, Inc. respectfully move the Court for an order extending the deadlines for Frito-Lay, Inc. and Rent-A-Center, Inc. to complete their rolling document productions pursuant to Paragraph 2(b) of the Joint Agreed Discovery Order (Dkt No. 247) until October 13, 2010, and to exchange their privilege logs, if any, pursuant to the Docket Control Order (Dkt No. 249) until November 1, 2010.

Dated: September 29, 2010

Respectfully submitted,

/s/ Jeffrey F. Yee

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**ATTORNEYS FOR DEFENDANTS
FRITO-LAY, INC. and RENT-A-
CENTER, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 29, 2010. Any other counsel of record will be served by first class mail on this same date.

/s/ Jeffrey F Yee

Jeffrey F. Yee