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

EOLAS TECHNOLOGIES) Civil Action No. 6:09-cv-44	6
INCORPORATED,)	
) Hon. Leonard E. Davis	
P	laintiff,)	
) JURY TRIAL	
v.)	
	`)	
ADOBE SYSTEMS INC. ET A	L.)	
D)efendants.)	
L	erendants.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME FOR STAPLES, INC. TO COMPLETE CERTAIN DISCOVERY

Defendant Staples, Inc. ("Staples") respectfully moves the Court to extend Staples' deadlines for rolling document production and to produce a privilege log from November 30, 2010 (Dkt. No. 481) to December 7, 2010.

Before the November 30, 2010 deadline, counsel for Staples alerted counsel for Plaintiff Eolas Technologies, Inc. ("Eolas") that logistical challenges would prevent a complete production by that date. Specifically, as a result of Eolas' Amended Infringement Contentions against Staples, Staples has been required to search for and produce additional documents beyond what was originally required. Staples has also encountered unforeseen delays in its collection of electronic documents, due in part to the implementation of a new e-discovery application. Staples has already produced documents to Eolas, including what it currently believes to be the bulk of its responsive documents, and will continue to produce documents on a rolling basis. The parties have conferred and agreed that Staples' deadlines for both the completion of document production and the production of a privilege log should be extended to December 7, 2010. As such, this motion is unopposed.

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

Accordingly, Staples respectfully requests that the Court grant this unopposed Motion and extend the specified document production and privilege log deadlines to December 7, 2010.

Date: November 30, 2010

Respectfully submitted,

/s/ Michael E. Richardson

Michael E. Richardson, TX Bar No. 24002838 BECK REDDEN & SECREST 1221 McKinney, Suite 4500 Houston, TX 77010

Telephone: (713) 951-6284 Facsimile: (713) 951-3720 mrichardson@brsfirm.com

Mark G. Matuschak, admitted pro hac vice
Donald R. Steinberg, admitted pro hac vice
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000
mark.matuschak@wilmerhale.com
donald.steinberg@wilmerhale.com

Kate Hutchins, admitted *pro hac vice* WILMER CUTLER PICKERING HALE AND DORR LLP 399 Park Avenue New York, NY 10011 Telephone: (212) 230-8800 Facsimile: (212) 230-8888

kate.hutchins@wilmerhale.com

Daniel V. Williams, admitted pro hac vice WILMER CUTLER PICKERING HALE AND DORR LLP 1875 Pennsylvania Avenue NW Washington, DC 20006 Telephone: (202) 663-6000 Facsimile: (202) 663-6363 daniel.williams@wilmerhale.com

ATTORNEYS FOR DEFENDANT STAPLES, INC.

CERTIFICATE OF CONFERENCE

I, Meaghan Davant, counsel for Staples, Inc. certify that I conferred with Matt Rappaport, counsel for Eolas, on this 30th day of November 2010, by telephone at approximately 12:00 p.m. (EDT). Mr. Rappaport confirmed that Eolas does not oppose this motion.

/s/ Meaghan Davant Meaghan Davant

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 STAPLES INC. 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 30th day of November 2010.

/s/ Michael E. Richardson Michael E. Richardson