

Eolas, Google, and YouTube (hereinafter “the parties”) have further discussed modifying the deadlines for expert reports. Therefore, Eolas respectfully requests an extension of time to serve the report of its damages expert concerning Google and YouTube’s damages until July 29, 2011.

The parties further agree that Eolas may supplement the report of its damages expert concerning Google and YouTube to the extent that relevant damages information is disclosed in documents produced after July 21, 2011 or Rule 30(b)(6) depositions of Google taken after July 21, 2011.

Further, the parties agree that Google and YouTube’s deadline for serving the rebuttal report of its damages expert shall be extended until August 26, 2011, and that Google and YouTube’s deadline for filing any Daubert motions related to Eolas’s damages expert report concerning Google and YouTube shall be extended until August 19, 2011.

Further, the parties agree that the deadline for Google and YouTube to identify trial witnesses shall be extended until August 12, 2011 and that the deadline for Eolas to identify rebuttal trial witnesses with respect to trial witnesses identified by Google and YouTube shall be extended until August 22, 2011.

III.

This motion is not for delay but so that justice may be done.

Wherefore, Eolas respectfully requests that the Court grant the present Motion, extend Eolas’s deadline for serving the expert report of its damages expert until July 29, 2011, allow supplementation of the report of Eolas’s damages expert if relevant damages information is disclosed in documents produced after July 21, 2011 or Rule 30(b)(6) depositions of Google taken after July 21, 2011, extend the deadline for the service of the report of Google and YouTube’s rebuttal damages expert until August 26, 2011, extend the deadline for Google and

YouTube to file any Daubert motions related to Eolas's damages expert report concerning Google and YouTube until August 19, 2011, extend the deadline for Google and YouTube to identify trial witnesses until August 12, 2011, and extend the deadline for Eolas to identify rebuttal trial witnesses with respect to trial witnesses identified by Google and YouTube until August 22, 2011.

DATED: July 25, 2011

Respectfully submitted,

McKOOL SMITH P.C.

By: /s/ Mike McKool

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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 document was served on all counsel who have consented to electronic services on July 25, 2011. Local Rule CV-5(a)3(A).

/s/ Christopher J. Mierzejewski
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