

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

i.think inc.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. 3-08-CV-0163-P
	§	
MINEKEY, INC;	§	
DELIP ANDRA; and	§	ECF
INTERNET UNLIMITED, LLC	§	
	§	
<i>Defendants.</i>	§	

**PLAINTIFF I.THINK INC.’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT INTERNET UNLIMITED’S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM FOR WHICH RELIEF CAN BE GRANTED**

Plaintiff i.think inc., by and through its undersigned counsel, hereby files this Unopposed Motion for Enlargement of Time to Respond to Defendant Internet Unlimited, LLC’s Motion to Dismiss for Failure to State a Claim for which Relief Can Be Granted, stating as follows:

1. Plaintiff i.think inc. filed an Original Petition and Application for Temporary and Permanent Restraining Order in *i.think inc. v. Minekey, Inc., Delip Andra and Internet Unlimited*, Cause No. 08-01055, in the 160th Judicial District Court, Dallas County, Texas on January 30, 2008.
2. Defendants Minekey, Inc. and Delip Andra (“Andra”), with the consent of Defendant Internet Unlimited, LLC (“IU”), removed the case to this Court on February 1, 2008.
3. In response to the removal, Plaintiff filed a Motion to Remand on February 13, 2008.

4. Defendant IU filed its Motion to Dismiss for Failure to State a Claim for which Relief Can Be Granted with this Court on March 13, 2008.

5. In the interests of judicial economy, and to provide additional time to explore settlement possibilities, i.think inc. respectfully requests that its deadline to respond to Defendant IU's Motion to Dismiss for Failure to State a Claim for which Relief Can Be Granted be enlarged until twenty days after this Court issues its order on the pending Motion to Remand.

6. This enlargement of time is sought prior to i.think inc.'s deadline to respond. Plaintiff files this motion in good faith, the motion will not prejudice IU, and IU does not oppose this motion.

7 This Court, on February 25, 2008, issued a similar Order Granting Unopposed Motion for Enlargement of Time to Respond to Motion to Dismiss, thereby extending Plaintiff's time to respond to Defendant Andra's Motion to Dismiss "until twenty days after this Court issues its order on the pending Motion to Remand."

8. A draft order is attached hereto pursuant to Local Rule 7.1(c).

Dated: March 28, 2008

Respectfully submitted,

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/s/ Talcott J. Franklin

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ATTORNEYS FOR PLAINTIFF i.think inc.

**CERTIFICATE OF CONFERENCE**

I hereby certify that on March 27, 2008, I, counsel for Plaintiff i.think inc., conferred with David S. O'Neil, counsel for Defendant Internet Unlimited, LLC, who confirmed that he is unopposed to the relief requested herein.

/s/ Jeffrey T. Prudhomme  
Jeffrey T. Prudhomme

**CERTIFICATE OF SERVICE**

This is to certify that the above and foregoing document was served upon all counsel of record by notice of electronic filing, pursuant to Fed. R. Civ. P. 5(b)(2)(D), today, March 28, 2008.

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/s/ Jeffrey T. Prudhomme  
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