

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

i.think inc.,

Plaintiff,

v.

MINEKEY, INC;
DELIP ANDRA; and
INTERNET UNLIMITED, LLC

Defendants.

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CIVIL ACTION NO. 3-08-CV-0163-P

ECF

PLAINTIFF I.THINK INC.’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT ANDRA’S MOTION TO DISMISS

Plaintiff i.think inc., by and through its undersigned counsel, hereby files this Unopposed Motion for Enlargement of Time to Respond to Defendant Andra’s Motion to Dismiss, 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”) removed the case to this Court on February 1, 2008. Andra then filed a Motion to Dismiss for Lack of Personal Jurisdiction on February 12, 2008.
3. In response to the removal, Plaintiff filed a Motion to Remand on February 13, 2008.

4. 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 Andra's Motion to Dismiss be enlarged until twenty days after the Court issues its order on the pending Motion to Remand.

5. 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 Andra, and Andra does not oppose this motion.

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

Dated: February 22, 2008

Respectfully submitted,

PATTON BOGGS LLP

/s/ Talcott J. Franklin

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ATTORNEYS FOR PLAINTIFF i.think inc.

CERTIFICATE OF CONFERENCE

I hereby certify that on February 20 and 21, 2008, counsel for Plaintiff i.think inc. conferred with Prescott W. Smith, counsel for Defendant Andra, 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, February 22, 2008.

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/s/ Jeffrey T. Prudhomme
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