

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ROSETTA STONE LTD.

Plaintiff,

v.

GOOGLE INC.

Defendant.

CIVIL ACTION NO. 1:09cv736
(GBL / TRJ)

CONSENT MOTION TO ALTER OR AMEND DEADLINES

COMES NOW Defendant Google Inc., by counsel, pursuant to the Federal Rules of Civil Procedure, and files this Consent Motion to Alter or Amend Deadlines, setting forth the following:

1. On July 17, 2012, the Honorable Theresa Carol Buchanan entered a Scheduling Order (Dkt. No. 248) adopting the parties' Joint Discovery Plan (Dkt. No. 247).
2. As part of the Joint Discovery Plan, certain deadlines were adopted for Defendant Google's filing of Motions in Limine. Specifically, the parties agreed that the Motions in Limine were to be filed by August 10, 2012, Oppositions to be filed by August 17, 2012, and Replies (if any) to be filed by August 22, 2012. As part of the Joint Discovery Plan, the Motions in Limine were to be heard on August 31, 2012.
3. On Friday August 10, 2012, the parties agreed to alter the filing deadlines and a Consent Motion (Dkt. No. 249) was filed requesting that the deadlines be changed as follows: Motions in Limine to be filed by August 15, 2012, Oppositions to be filed by August 24, 2012, and Replies (if any) to be filed by August 29, 2012.
4. By further agreement, the parties now request that the hearing date be changed from August 31, 2012 until September 7, 2012.

WHEREFORE, in consideration of the foregoing the parties respectfully request that the Court enter the Proposed Consent Order attached hereto as Exhibit A and grant them such other and further relief as the Court deems just and appropriate.

Respectfully Submitted,

GOOGLE INC.
By counsel

/s/

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SEEN AND AGREED

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of August, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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