

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CAMBRIDGE UNIVERSITY PRESS,
et al,

Plaintiffs,

-vs.-

MARK P. BECKER, in his official
capacity as Georgia State University
President, et al,

Defendants.

Civil Action File
No.1:08-CV-1425-ODE

**JOINT MOTION FOR AN EXTENSION OF TIME TO TAKE
DEPOSITIONS, AND SUPPORTING MEMORANDUM**

Plaintiffs Cambridge University Press, Oxford University Press, Inc., and Sage Publications, Inc. (collectively “Plaintiffs”) and Defendants Mark P. Becker, Ron Henry, Nancy Seamans, J.L. Albert, Kenneth R. Bernard, Jr., James A. Bishop, Hugh A. Carter, Jr., William H. Cleveland, Robert F. Hatcher, Felton Jenkins, W. Mansfield Jennings, Jr., James R. Jolly, Donald M. Leebern, Jr., Elridge McMillan, William NeSmith, Jr., Doreen Stiles Poitevint, Willis J. Potts, Jr., Wanda Yancey Rodwell, Kessel Stelling, Jr., Benjamin J. Tarbuton, III, Richard L. Tucker, and Allan Vigil (collectively “Defendants”), by and through their undersigned counsel, respectfully move the Court for an extension of the

discovery period in this action for the limited purpose of scheduling and taking depositions. In support of this motion, the Parties show the Court as follows:

1.

This copyright infringement action was commenced on April 15, 2008 when Plaintiffs filed their complaint. Plaintiffs amended their complaint on December 15, 2008, at the consent of Defendants, to add as Defendants individual members of the Board of Regents of the University System of Georgia in their official capacities.

2.

The Court entered a scheduling Order in this case on July 30, 2008 providing for an eight-month discovery period.

3.

The Court entered a second scheduling order in this case on February 24, 2009 extending the time to complete discovery until May 25, 2009.

4.

The Parties have worked diligently to complete discovery in this matter but will not be able to complete all depositions by the May 25, 2009 deadline. Because of scheduling difficulties with certain deponents due in most part to the academic calendar and the complicated schedules of Georgia State University

faculty members as the end of the current semester approaches, the Parties do not anticipate being able to schedule those depositions before the existing deadline expires.

5.

The Parties wish to provide each other with sufficient time to complete the discovery necessary in this matter as expeditiously as possible.

6.

The Parties have agreed that the deadline for taking depositions in this case should be extended until June 30, 2009, but that all other discovery should be completed by the existing deadline.

WHEREFORE, the Parties respectfully move this Court for entry of an Order extending the time for taking depositions. A Proposed Order is attached for the Court's convenience.

Respectfully submitted this 22nd day of April, 2009.

/s/ John H. Rains IV

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CERTIFICATE OF COMPLIANCE

I hereby certify that this document was prepared in Times New Roman 14 point font.

/s/ John H. Rains IV
John H. Rains IV

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing **JOINT MOTION FOR AN EXTENSION OF TIME TO TAKE DEPOSITIONS, AND SUPPORTING MEMORANDUM** with the Clerk of Court using the CM/ECF filing system which will automatically send e-mail notification of such filing to the following attorneys of record:

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This 22nd day of April, 2009.

/s/ John H. Rains IV
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