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Honorable Denny Chin
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

Re: American Society of Media Photographers, et al. v. Google, Inc.
Civ. Action No. 10-CV-2977 (DC)

Your Honor:

This Firm serves as counsel to the named plaintiffs and putative class in the above-referenced action. As the record reflects, defendant Google, Inc. ("Google") has yet to respond to the Complaint therein. Google's response is currently due on or before November 7, 2011.

Counsel to Google has advised that, absent amendment by plaintiffs, it intends to move to dismiss the Complaint. Upon reflection and in an effort to avoid and/or streamline motion practice, plaintiffs intend to amend the Complaint to address certain issues recently identified by Google.

Accordingly, plaintiffs hereby request leave until November 18, 2011 to amend the Complaint. Should the Court grant the request, Google's response to the amended pleading would then be due, in accordance with the Federal Rules of Civil Procedure, within fourteen (14) days thereafter, or by December 2, 2011.

Counsel to Google consent to this request.

Respectfully,

*Approved.
SO ORDERED*

Mark A. Berube USCJ
11/2/11

Mark A. Berube

cc: Daralyn J. Durie, Esq.
Joseph C. Gratz, Esq.