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BY FACSIMILE

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

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

Your Honor:

We are writing pursuant to Rule 1(E) of Your Honor's Individual Practices.

Plaintiffs are contemplating a motion to strike certain of defendant Google, Inc.'s ("Google") affirmative defenses pursuant to Federal Rule of Civil Procedure 12(f). The parties have been conferring in good faith to determine if such a motion will be necessary or if plaintiffs' issues can be resolved on a consensual basis. In light of these ongoing discussions, plaintiffs request a one week extension of time to determine if motion practice will be necessary. If the parties are unable to resolve their issues, plaintiffs would, on or before July 16, 2012, request a Pre-Motion Conference with the Court pursuant to Rule 2(A) of Your Honor's Individual Practices. The motion to strike is currently due on or before July 9, 2012.


GRANTED.
SO ORDERED

WSCJ
7-9-2012

Mishcon de Reya

There have been no previous requests for an extension of this deadline, and Google consents to plaintiffs' request for a one week extension.

Respectfully,



Mark A. Berube

cc: Daralyn J. Durie, Esq.
Joseph C. Gratz, Esq.
James J. McGuire, Esq.
Vincent Filardo, Jr., Esq.
(all by e-mail)