

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
Waco Division**

MPHJ TECHNOLOGY INVESTMENTS, LLC, inclusive of its subsidiaries,)
)
)
 Plaintiff,)
)
 v.)
)
FEDERAL TRADE COMMISSION;)
EDITH RAMIREZ, in her official capacity)
 as Commissioner and Chairwoman, Federal)
 Trade Commission; **JULIE BRILL**, in her)
 official capacity as Commissioner, Federal)
 Trade Commission; **MAUREEN K.)
 OHLHAUSEN**, in her official capacity as)
 Commissioner, Federal Trade Commission;)
JOSHUA D. WRIGHT, in his official)
 capacity as Commissioner, Federal Trade)
 Commission; and **JESSICA RICH**, in her)
 official capacity as Director, Bureau of)
 Consumer Protection, Federal Trade)
 Commission,)
)
 Defendants.)

Civil No. 6:14-cv-00011-WSS

**MPHJ TECHNOLOGY INVESTMENTS, LLC’S UNOPPOSED MOTION FOR
EXTENSION OF TIME UNDER L.R. CV-7(e)(2) AND EXTENSION OF PAGE LIMIT
UNDER L.R. CV-7(e)(3) TO RESPOND TO DEFENDANTS’ MOTION TO DISMISS**

Plaintiff MPHJ Technology Investments, LLC (“MPHJ”) respectfully submits this Motion seeking an extension of two (2) weeks to respond to Defendants’ Motion to Dismiss, and for authorization to have thirty (30) pages for its Response. Plaintiff has consulted with counsel for Defendants, and Defendants do not oppose this Motion provided they are afforded certain extensions for their Reply as set forth below.

Defendants’ Motion to Dismiss raises issues under Rule 12(b)(1), and Rule 12(b)(6), and makes numerous factual allegations. Plaintiff respectfully believes it will be able to more

clearly provide the Court briefing on the multiple issues raised if it is afforded an additional ten pages, so that its responsive brief shall not exceed thirty (30) pages. Further, because of certain intervening obligations, Plaintiff respectfully requests an extension of approximately two weeks for it to file its responsive brief. That brief is now due on April 3, 2014, and Plaintiff would request that date be moved to April 18, 2014.

Defendants have been consulted and have confirmed that they do not oppose the timing and page limit extensions requested by Plaintiff, provided Defendants are afforded proportional extensions (an extra five pages, and an extra week) for their Reply. WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and order that Plaintiff's Response to the Motion to Dismiss be filed on or before April 18, 2014, and not exceed thirty (30) pages, and that Defendants' Reply is due on or before May 6, 2014, and not exceed fifteen (15) pages. Plaintiff does not oppose this request, and respectfully requests entry of the attached Proposed Order.

Dated: March 21, 2014

Respectfully submitted,

/s/ Jim Dunnam

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Attorneys for Plaintiff
MPHJ Technology Investments, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2014, I electronically filed MPHJ Technology Investments, LLC's Unopposed Motion For Extension Of Time Under L.R. Cv-7(E)(2) And For Extension Of Page Limit Under Local Rule Cv-7(E)(3) To Respond To Defendants' Motion To Dismiss, and Proposed Order, with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered counsel.

/s/ Jim Dunnam

Jim Dunnam