

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

CURTIS J. NEELEY, Jr.

PLAINTIFF

VS.

CASE NO. 5:09-cv-05151-JLH

**NAMEMEDIA, INC.;
NETWORK SOLUTIONS, INC.;
and GOOGLE, INC.**

DEFENDANTS

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTION FOR SUMMARY JUDGMENT**

Separate Defendant NameMedia, Inc. ("NameMedia"), for its Motion for Extension of Time to Respond to Motion for Summary Judgment, states as follows:

1. Plaintiff has filed a motion for summary judgment on his entire complaint as to the issue of liability; the response to that motion is due Monday, March 1;
2. The Court has not even issued its initial scheduling order yet, so no discovery has taken place;
3. Plaintiff's motion raises numerous factual issues upon which NameMedia has had no opportunity to conduct discovery;
4. NameMedia cannot currently adequately respond to the motion without the conduct of discovery;
5. Although NameMedia will file a response to the motion by March 1 in the event Court does not grant an extension as requested herein, NameMedia requests that the Court either enter its order prior to March 1; or alternatively, subsequent to March 1 enter an order allowing NameMedia to supplement its response after it has had the opportunity to conduct discovery.

WHEREFORE, NameMedia requests that the Court enter an order extending the due date for its response to Plaintiff's motion for summary judgment until after NameMedia has had the opportunity to conduct discovery, or in the alternative, an order allowing NameMedia to supplement its response after NameMedia has had an opportunity to conduct discovery, and for all other relief to which they may be entitled.

Respectfully submitted,

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By: /s/ H. William Allen
H. William Allen

By: /s/ Brooks C. White
Brooks C. White

Attorneys for Defendant NameMedia, Inc.

CERTIFICATE OF SERVICE

I, Brooks C. White, hereby certify that on this 24th day of February, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following attorneys of record:

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I further certify that, on this 24th day of February, 2010, I mailed a copy of the foregoing to the following *pro se* plaintiff:

Mr. Curtis J. Neeley, Jr.
2619 N. Quality Lane, Apt. 123
Fayetteville, AR 72703

/s/ Brooks C. White
Brooks C. White