

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
Civil Action No. 1:15-cv-102**

WINDY CITY INNOVATIONS, LLC,)	
Plaintiff,)	
)	
v.)	MOTION FOR EXTENSION OF TIME
)	
FACEBOOK, INC.,)	
Defendant.)	
<hr/>)	

Pursuant to Rule 6(b) and LCvRs 5.2.1, 5.3, and 7.1, the Defendant moves for an extension of time within which to answer, respond, or otherwise plead to and including July 24, 2015. The Defendant was served with a copy of the Summons and Complaint on June 3, 2015, and responsive pleadings are due on June 24, 2015. The grounds for this Motion are that the Defendant was served on June 3, 2015 with this Complaint which involves four patents encompassing over 800 claims and further that Defendant has only recently retained counsel in this matter. Defendant needs more time to prepare its response to Plaintiff's Complaint. By this Motion the Defendant seeks a thirty day extension of time.

Defendant's counsel has conferred with counsel for the Plaintiff and represents that Plaintiff does not object to entry of an Order granting this Motion.

This the 22nd day of June, 2015.

THE VAN WINKLE LAW FIRM

By: /s/ Larry McDevitt

Larry McDevitt, NC Bar # 5032
David M. Wilkerson, NC Bar # 35742
P.O. Box 7376
Asheville, NC 28801-7376
Phone: 828-258-2991
Fax: 828-257-2767

Reuben Chen
Cooley LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
rchen@cooley.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on June 22, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Philip S. Anderson
Robert B. Long, Jr.

Long, Parker, Warren, Anderson & Payne, P.A.

Bradley W. Caldwell
Jason D. Cassady
John Austin Curry
Warren J. McCarty

Caldwell, Cassady & Curry, P.C.

ATTORNEYS FOR PLAINTIFF

This 22nd day of June, 2015.

s/Larry McDevitt
Larry McDevitt