IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

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B.E. TECHNOLOGY, L.L.C.,	
Plaintiff,	
V.	
GROUPON, INC.,	
Defendant.	

Civil Action No. 2:12-cv-02781-JPM-cgc

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND AND MEMORANDUM IN SUPPORT THEREOF

Defendant, Groupon, Inc. ("Groupon"), respectfully moves for an extension of time in which Groupon may respond to the Motion to Dismiss Under Fed. R. Civ. P. 12(b)(6) and Motion to Strike Under Fed. R. Civ. P. 12(f) (Doc. 24), filed by Plaintiff on January 25, 2013. In support of the motion, Groupon states as follows:

1. Plaintiff's motion seeks relief under both Rule 12(b) and Rule 12(f).

2. Pursuant to Local Rule 12.1, a party opposing a motion to dismiss under Rule

12(b) must file a response within 28 days. Pursuant to Local Rule 7.2, however, a party

opposing a motion to strike under Rule 12(f) must file a response within 14 days.

3. In the interest of efficiency, Groupon prefers to address all of the issues raised in Plaintiff's motion in a single response.

4. Groupon therefore respectfully requests that the Court grant an extension of time to respond to the portion of Plaintiff's motion seeking relief under Rule 12(f) such that the deadline for Groupon's combined response is February 25, 2013.

WHEREFORE, Groupon respectfully requests that the Court grant this motion and allow

it up to and including February 25, 2013, in which to file a combined response to Plaintiff's

Motion to Dismiss Under Fed. R. Civ. P. 12(b)(6) and Motion to Strike Under Fed. R. Civ. P.

12(f).

DOCKE.

Respectfully submitted,

/s/ Annie T. Christoff John S. Golwen (TN BPR #014324) Annie T. Christoff (TN BPR #026241) BASS, BERRY & SIMS, PLC 100 Peabody Place, Suite 900 Memphis, Tennessee 38103 Telephone: (901) 543-5900 Facsimile: (901) 543-5999 Email: jgolwen@bassberry.com achristoff@bassberry.com

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Attorneys for Defendant, Groupon, Inc.

CERTIFICATE OF CONSULTATION

Prior to the filing of this motion, counsel for Plaintiff, Richard Carter, was consulted and indicated that Plaintiff does not object to the relief requested herein.

/s/ Annie T. Christoff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of February, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Annie T. Christoff

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