

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

e360 INSIGHT, LLC, an Illinois Limited Liability Company, and DAVID LINHARDT, an individual,)	
)	06 CV 3958
)	
Plaintiffs,)	
)	Judge Kocoras
v.)	
)	Magistrate Judge Brown
THE SPAMHAUS PROJECT, a company limited by guarantee and organized under the laws of England, a/k/a THE SPAMHAUS PROJECT, LTD.,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE
INSTANTER A STATUS REPORT ON SUGGESTED DEPOSITION**

Defendant The Spamhaus Project (“Spamhaus”),¹ by and through its attorneys Jenner & Block LLP, respectfully moves this Court for the entry of an order granting Spamhaus leave to file instanter the 4-page Status Report attached as Exhibit A. In support of this motion, Spamhaus states that the parties have agreed that the voluntary telephonic deposition of Steve Linford should not proceed because Plaintiffs’ counsel was not interested in taking the deposition within the scope of Steve Linford’s offer to provide testimony.

Because Your Honor suggested that Plaintiffs accept Steve Linford’s prior offer to sit for a telephonic deposition, Spamhaus respectfully desired to advise the Court, prior to the continued hearing date, that the deposition did not proceed and the reasons why it did not proceed.

¹ Defendant expressly objects to this Court’s jurisdiction over The Spamhaus Project because Defendant is based solely in the United Kingdom and does not conduct or transact business in Illinois. Moreover, Defendant reserves its arguments based on Plaintiffs’ failure to properly effect service of process.

Respectfully submitted,

THE SPAMHAUS PROJECT

Dated: August 21, 2007

By: s/David Jiménez-Ekman
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David Jiménez-Ekman
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CERTIFICATE OF SERVICE

I, Carrie A. Fino, an attorney, hereby certify that I served the foregoing **Defendant's**

Motion for Leave to File Instantly a Status Report on Suggested Deposition upon:

Bartly Joseph Loethen
Synergy Law Group, L.L.C.
730 West Randolph Street
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by depositing a copy of same in the United States Mail, postage prepaid, on this 21st day of August 2007.

s/ Carrie A. Fino