

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

E360INSIGHT, LLC,)	
an Illinois Limited Liability Company, and)	
DAVID LINHARDT, an individual)	
)	
Plaintiffs,)	06 CV 3958
)	
v.)	Judge Kocoras
)	
THE SPAMHAUS PROJECT,)	Magistrate Judge Brown
a company limited by guarantee and)	
organized under the laws of England, aka)	
THE SPAMHAUS PROJECT LTD,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF DISCOVERY SCHEDULE

Plaintiffs, e360Insight, LLC and David Linhardt (collectively Plaintiffs), by and through their attorneys, Synergy Law Group, LLC, respectfully requests that this Court grant Plaintiffs’ Motion For Extension Of Discovery Schedule. In support of this motion Plaintiffs state:

1. On December 5, 2007, this Court ordered that all discovery is to be completed by February 28, 2008. (ECF No. 138).
2. Both parties have exchanged written discovery.
3. In preparing responses to the discovery and realizing that there will be a need for depositions and subpoenas to third parties, Plaintiff proposes extending the current discovery schedule.

4. Pursuant to Local Rule 37.2, the parties conferred in person on February 5, 2008 and discussed extending the current discovery schedule.

5. Consistent with the attached draft Order, Plaintiffs request that the Court extend the discovery schedule as follows: responses by both parties to all written discovery shall be completed by February 29, 2008; any motions to compel shall be filed by March 31, 2008; all written discovery closes on April 17, 2008; Plaintiffs to disclose experts, if any, by March 31, 2008; Defendant to disclose experts by April 14, 2008; all oral discovery closes on April 28, 2008.

6. This motion is not brought to cause undue delay but rather to have the discovery schedule reflect the time required to conduct the necessary discovery.

Respectfully submitted,

e360Insight LLC and David Linhardt

By: /s/ Daniel J. Peters
One of Their Attorneys

Bartly J. Loethen (6225484)
Joseph L. Kish (6197916)
Daniel J. Peters (6272859)
Synergy Law Group, LLC
730 West Randolph, 6th Floor
Chicago, Illinois 60661
Telephone: (312) 454-0015
Facsimile: (312) 454-0261

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ORDER

This matter coming to be heard Plaintiffs', e360Insight, LLC and David Linhardt (collectively Plaintiffs), by and through their attorneys, Synergy Law Group, LLC, Motion For Extension Of Discovery Schedule, IT IS ORDERED:

1. The discovery schedule entered on December 5, 2007, (ECF No. 138) is stricken.
2. The revised discovery schedule is as follows:
 - i. responses by both parties to all written discovery shall be completed by February 29, 2008;
 - ii. any motions to compel shall be filed by March 31, 2008;
 - iii. all written discovery closes on April 17, 2008;
 - iv. Plaintiffs to disclose experts, if any, by March 31, 2008;

- v. Defendant to disclose experts by April 14, 2008; and,
- vi. all oral discovery closes on April 28, 2008.

SO ORDERED THIS ____ day of _____,2008.

Honorable Judge Charles P. Kocoras

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Notice of Plaintiffs' Motion for Extension of Discovery Schedule was served upon the attorneys listed below electronically through CM/ECF on February 8, 2008.

Craig Christopher Martin cmartin@jenner.com,docketing@jenner.com

Matthew M. Neumeier neumeierm@howrey.com,basak@howrey.com

David Eric Jimenez-Ekman djimenez-ekman@jenner.com,docketing@jenner.com

Andrew Bruce Cripe acripe@hinshawlaw.com,courtfilng@hinshawlaw.com

Stephen M Geissler sgeissler@jenner.com

Daniel Joseph Peters dpeters@synergylawgroup.com,nmcdonald@synergylawgroup.com

Joseph L Kish jkish@synergylawgroup.com,nmcdonald@synergylawgroup.com

Evan D Brown ebrown@hinshawlaw.com

Carrie A Fino cfino@jenner.com

Chad Emerson Bell cbell@jenner.com

By: /s/ Daniel J. Peters
 One of Their Attorneys

Bartley J. Loethen (6225484)
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