

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CAPITOL RECORDS INC., a
Delaware corporation; SONY BMG
MUSIC ENTERTAINMENT, a
Delaware general partnership;
ARISTA RECORDS LLC, a
Delaware limited liability company;
INTERSCOPE RECORDS, a
California general partnership;
WARNER BROS. RECORDS INC., a
Delaware corporation;
and UMG RECORDINGS, INC., a
Delaware corporation,

Plaintiffs,

v.

Jammie Thomas,

Defendant.

Case No. 06-cv-1497 (MJD/RLE)

**MEMORANDUM OF LAW IN
SUPPORT OF DEFENDANT'S
MOTION FOR EXTENSION OF
DISCOVERY SCHEDULE**

Defendant is a single mother living in rural Minnesota who has been sued by a number of Plaintiffs, who collectively have assets described in terms of billions of dollars. Defendant has no ability to pay for an expert, and without the benefit of an expert, she can provide no meaningful defense against the forces and resources arrayed against her.

Last week, the Free Software Foundation provided a grant to Defendant. It provides Defendant with \$3,000 to pay for an expert. There are no strings attached to this offer; the money is there to be used solely for engaging an expert.

Defendant's counsel is in a final interviewing process and it appears likely that for that amount of money, a distinguished professor from the University of Minnesota may make himself available as Defendant's expert.

Defendant, of course, cannot take advantage of this generous offer unless the Court modifies its discovery schedule to allow for the same.

Defendant has not previously asked for such an extension, however, Plaintiffs have in the past moved the Court for such an extension of the discovery deadline and this Court granted Plaintiffs' motion to do so. See Docket No. 25.

Dated: January 26, 2009

Respectfully submitted,

CHESTNUT & CAMBRONNE, P.A.

By /s/ Brian N. Toder

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