Jeffrey M. Gold, Esq. (*pro hac vice*)
Morgan, Lewis & Bockius, LLP
101 Park Avenue
New York, New York 10178-0060
Tel: (212) 309-6000
Fax: (212) 309-6001

J. Kevin Fee, Esq. (D.C. Bar No. 494016)
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
Tel.: (202) 739-3000
Fax: (202) 739-3001

Scott D. Stimpson, Esq. (*pro hac vice*)
The Law Office of Scott D. Stimpson
445 Hamilton Avenue -- Suite 1102
White Plains, New York 10601
Tel: (203) 258-8412

Attorneys for Plaintiff and Counter-Defendant Casio Inc. and Counter-Defendant Casio Computer Co., Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

CASIO INC., **Plaintiff** **v.** **PAPST LICENSING GMBH & CO. KG** **Defendant.**	**Case No. 1:06-CV-01751** **Judge: Gladys Kessler** **Magistrate Judge: Deborah Robinson** **Next status conference: December 4, 2007**
PAPST LICENSING GMBH & CO. KG, **Counter-Plaintiff** **v.** **CASIO INC. and CASIO COMPUTER CO., LTD.** **Counter-Defendants**	

RESPONSE TO PAPST'S REQUEST FOR AN EXTENSION

In opposition to our original Motion to Compel, Papst's counsel expressly told the Court: "If the Court were to find that Papst Licensing should provide responses to Casio USA's written discovery requests, Papst Licensing is prepared to do so within seven days of any such Court order." Papst's opposition, page 3. Thus, Papst ought not complain about the ten days they were given.

Papst has delayed production for months. To date, in response to our document requests served on March 2, Papst has not produced a single document, and it is now apparent that even counsel for Papst does not have them ("documents will need to be obtained from Germany", Papst's instant request, p.1). Nevertheless, while we do not join in Papst's request and would not object to an order proscribing any further delays, Casio will not oppose Papst's request and thereby create another dispute for the Court.

Finally, counsel for Papst gave us little more than an hour to respond to their request for an extension, and we simply had insufficient time to contact them before they filed their motion. Such a small window of time to respond to a request for a meet and confer seems inappropriate to satisfy Rule 7(m).

DATED: June 8, 2007

Jeffrey M. Gold, Esq. (*pro hac vice*)
Morgan, Lewis & Bockius, LLP
101 Park Avenue
New York, New York 10178-0060
Tel: (212) 309-6000
Fax: (212) 309-6001

J. Kevin Fee, Esq. (D.C. Bar No. 494016)
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
Tel.: (202) 739-3000
Fax: (202) 739-3001

Scott D. Stimpson, Esq. (*pro hac vice*)
The Law Office of Scott D. Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, New York 10601
Tel: (203) 258-8412

Attorneys for Plaintiff and Counter-Defendant Casio Inc.
and Counter-Defendant Casio Computer Co., Ltd.