### ORIGINAL

#### UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION



In the Matter of	
INTEL CORPORATION,	
Respondent.	

**PUBLIC** 

Docket No. 9341

# SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME FOR LENOVO GROUP LIMITED TO FILE MOTION TO QUASH OR TO LIMIT COMPLAINT COUNSEL'S SUBPOENA DUCES TECUM

COMES NOW LENOVO GROUP LIMITED, BY AND THROUGH ITS COUNSEL AND MOVES AS FOLLOWS:

- 1. On or about March 22, 2010, Lenovo Group Limited ("Lenovo") received service of a Subpoena *Duces Tecum* (the "Subpoena") in the above-captioned matter. The Subpoena includes twenty-one (21) specifications.
- 2. Under the Federal Trade Commission's applicable Rules of Practice, Lenovo's deadline for filing a motion to quash or to limit the Subpoena was April 1, 2010. On April 1, Lenovo filed an unopposed motion for extension of time to respond to the subpoena. The Court granted the motion that same day and extended the deadline until April 15, 2010.
- 3. Lenovo and Complaint Counsel are in continuing discussions regarding the scope of Complaint Counsel's specifications, any objections by Lenovo thereto, and the time required for Lenovo to search for, process and produce responsive documents. To facilitate those discussions, Lenovo has requested that Complaint Counsel agree that Lenovo shall have an additional ten (10) days in which to file a motion to quash or a motion to limit should the parties be unable to resolve all issues regarding the scope of the subpoena and the time required for Lenovo to produce responsive documents.

- 4. Therefore, Lenovo requests that this Court grant it until April 25, 2010 to file a motion to quash or motion to limit, and that Lenovo's obligation to otherwise respond to the Subpoena shall be tolled during that period. This extension has been agreed upon in order to afford Lenovo and Complaint Counsel additional time to limit the scope in order to avoid the necessity of filing a motion to quash or a motion to limit.
- 5. Undersigned counsel represents that he has conferred with Complaint Counsel and that Complaint Counsel does not object to the proposed extension.

Dated: April 15, 2010

Respectfully submitted,

W. Andrew Copenhaver

WOMBLE CARLYLE SANDRIDGE & RICE PLLC

One West Fourth Street Winston-Salem, NC 27101

Tel: 336-721-3633 acopenhaver@wcsr.com

Counsel for Lenovo Group Limited

#### UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

In the Matter of	PUBLIC
INTEL CORPORATION,	Docket No. 9341
Respondent.	

### PROOF OF SERVICE OF PUBLIC FILING AND CERTIFICATION PURSUANT TO 16 C.F.R. § 4.2

I, W. Andrew Copenhaver, hereby certify that on this 15th day of April, 2010, I caused a copy of the following documents to be served by *hand* on: The Office of the Secretary of the Federal Trade Commission (original and two copies) and The Honorable D. Michael Chappell (two copies),

and by electronic mail to: The Honorable D. Michael Chappell (oalj@ftc.gov); Melanie Sabo (msabo@ftc.gov); J. Robert Robertson (rroberston@ftc.gov); Kyle D. Andeer (kandeer@ftc.gov); Teresa Martin (tmartin@ftc.gov); Thomas H. Brock (tbrock@ftc.gov); Theodore Zang, Jr. (tzang@ftc.gov); James C. Burling (james.burling@wilmerhale.com); Eric Mahr (eric.mahr@wilmerhale.com); Wendy A. Terry (wendy.terry@wilmerhale.com); Robert E. Cooper (rcooper@gibsondunn.com); Joseph Kattan PC (jkattan@gibsondunn.com); Daniel Floyd (dfloyd@gibsondunn.com); Darren B. Bernhard (BernhardD@howrey.com): and Thomas J. Dillickratch (DillickrathT@howrey.com):

- (1) Lenovo Group Limited's Unopposed Motion for Extension of Time To File Motion To Quash or To Limit Complaint Counsel's Subpoena *Duces Tecum*
- (2) [Proposed] Order Regarding Lenovo Group Limited's Deadline To File Motion To Quash or To Limit Complaint Counsel's Subpoena *Duces Tecum*; and
- (3) This Proof of Service

Pursuant to 16 C.F.R. § 4.2, I hereby certify that a paper copy of each of these documents with an original signature is being filed with the Secretary of the Commission today by hand, and a true and correct electronic copy of these documents is being sent to the Secretary by email to <a href="mailto:secretary@ftc.gov">secretary@ftc.gov</a> and <a href="mailto:dclark@ftc.gov">dclark@ftc.gov</a>.

W. Andrew Copenhaver

WOMBLE CARLYLE SANDRIDGE & RICE PLLC

One West Fourth Street Winston-Salem, NC 27101

Tel: 336-721-3633 acopenhaver@wcsr.com

Counsel for Lenovo Group Limited

## UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

In the Matter of	PUBLIC
INTEL CORPORATION,	Docket No. 9341
Respondent.	
[PROPOSED] ORDER REGARDING LENO FILE MOTION TO QUASH OR TO I SUBPOENA DU	LIMIT COMPLAINT COUNSEL'S
Lenovo Group Limited proposes the entry Limited's Response to Complaint Counsel's Subport Limited's deadline to file a motion to quash or motion and including April 25, 2010.	oena Duces Tecum, extending Lenovo Group
Good cause having been shown,	
IT IS SO ORDERED:	
That the Second Unopposed Motion for Ext File Motion To Quash or To Limit Complaint Cour and	tension of Time for Lenovo Group Limited to nsel's Subpoena <i>Duces Tecum</i> is GRANTED;
Lenovo Group Limited's deadline to file a n Subpoena <i>Duces Tecum</i> is hereby extended until an	notion to quash or motion to limit the d including April 25, 2010.
	D. Michael Chappell Administrative Law Judge

DATED: \_\_\_\_\_