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11 UNITED STATES DISTRICT COURT
 12 CENTRAL DISTRICT OF CALIFORNIA

13 PERFECT 10, INC., a California
 14 corporation,
 15 *Plaintiff,*

16 vs.

17 GOOGLE INC., a corporation; and
 18 DOES 1 through 100, inclusive,
 19 *Defendants.*

20 AND COUNTERCLAIM

21 PERFECT 10, INC., a California
 22 corporation,
 23 *Plaintiff,*

24 vs.

25 AMAZON.COM, INC., a corporation;
 26 A9.COM, INC., a corporation; and
 27 DOES 1 through 100, inclusive,
 28 *Defendants.*

CASE NO. CV 04-9484 AHM (SHx)
 [Consolidated with Case No. CV 05-
 4753 AHM (SHx)]

DISCOVERY MATTER

**GOOGLE INC.'S SECOND
 SUPPLEMENTAL
 MEMORANDUM IN SUPPORT OF
 ITS MOTION TO COMPEL
 PERFECT 10, INC. TO AFFIX
 CONTROL NUMBERS TO ITS
 DOCUMENT PRODUCTION**

Hon. Stephen J. Hillman

Date: None [Currently under
 submission]
 Time: None
 Crtrm.: 550

Discovery Cutoff: None Set
 Pretrial Conference Date: None Set
 Trial Date: None Set

1 Pursuant to the Court's request during the November 3, 2009 telephonic
2 conference, Google Inc. has located the following consultant to advise the Court on
3 the feasibility of whether Perfect 10 can employ Adobe Acrobat Professional to
4 Bates number its electronic document productions:

5 Diane Price

6 Application Specialist at Traveling Coaches, Inc.

7 1700 Pacific Avenue, Suite 2750, Dallas, TX 75201

8 <http://www.travelingcoaches.com/>

9 800-493-4083

10 Google located Ms. Price through a referral from Adobe, Inc. Ms. Price has
11 informed Google that she has extensive experience managing document production
12 projects with Adobe Acrobat Professional (as well as other litigation support
13 software), and is available to take on this project. Ms. Price estimated that if sent a
14 hard drive, she could do an initial assessment regarding the feasibility of using
15 Adobe Acrobat Professional's bates stamping feature to affix control numbers to the
16 files on that hard drive in approximately four hours. Her hourly rate is \$145.

17 Defendants Amazon.com, Inc., Alexa Internet, and A9.com have stipulated to
18 using Ms. Price as a court-appointed neutral expert, and further advise that if Ms.
19 Price is unable to answer the Court's questions to the Court's satisfaction, the Court
20 would be free to seek other opinions. Perfect 10 has spoken with Ms. Price by
21 phone and has raised no objection to Ms. Price's qualifications and expertise to
22 advise the Court regarding Adobe Professional software.

23 DATED: November 11, 2009

Respectfully submitted,

24 QUINN EMANUEL URQUHART OLIVER &
25 HEDGES, LLP

26
27 By *Rachel Herrick Kassabian*
Rachel Herrick Kassabian
28 Attorneys for Defendant GOOGLE INC.