1 2 3 4 5 6 7 8 9 10	QUINN EMANUEL URQUHART & SU Michael T. Zeller (Bar No. 196417) michaelzeller@quinnemanuel.com 865 South Figueroa Street, 10th Floor Los Angeles, California 90017-2543 Telephone: (213) 443-3000 Facsimile: (213) 443-3100 Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com 50 California Street, 22nd Floor San Francisco, California 94111 Rachel Herrick Kassabian (Bar No. 191) rachelkassabian@quinnemanuel.com 555 Twin Dolphin Drive, 5th Floor Redwood Shores, California 94065 Attorneys for Defendant GOOGLE INC.	)
11	UNITED STATES DISTRICT COURT	
12	CENTRAL DISTRIC	CT OF CALIFORNIA
13 14	PERFECT 10, INC., a California corporation,	CASE NO. CV 04-9484 AHM (SHx) [Consolidated with Case No. CV 05- 4753 AHM (SHx)]
15	Plaintiff,	GOOGLE INC.'S NOTICE OF
16 17 18	vs. GOOGLE INC., a corporation; and DOES 1 through 100, inclusive, <i>Defendants</i> .	LODGING OF GOOGLE'S PREVIOUSLY FILED MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND SUPPORTING DOCUMENTS
19	AND COUNTERCLAIM	Hon. A. Howard Matz
20 21	PERFECT 10, INC., a California corporation,	Date: April 5, 2010 Time: 10:00 a.m. Ctrm: 14
22	Plaintiff,	Discovery Cut-off: None Set
23	VS.	Pretrial Conference Date: None Set Trial Date: None Set
24	AMAZON.COM, INC., a corporation; A9.COM, INC., a corporation; and DOES 1 through 100, inclusive,	
25	DOES 1 through 100, inclusive,	
26	Defendants.	
27		
28 01980.51320/3369936.1		
01700.31320/3307730.I	GOOGLE'S NOTICE OF LODGING OF MOTION ENTITLEMENT TO SAFE HARBOR UNDER 17	NS FOR SUMMARY JUDGMENT RE: GOOGLE'S VU.S.C. § 512, AND SUPPORTING DOCUMENTS Dockets.Justia.

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1	NOTICE IS HEREBY GIVEN that in support of Google Inc.'s Opposition to	
2	Plaintiff Perfect 10, Inc.'s Second Motion for Preliminary Injunction and pursuant to	
3	this Court's Local Rule 5-1, Defendant Google Inc. ("Google") hereby lodges the	
4	following documents with the Court:	
5	<b>Google's DMCA Opening Briefs And Supporting Materials</b>	
6	DEFENDANT GOOGLE'S NOTICE OF MOTION AND MOTION	
7	FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT	
8	TO SAFE HARBOR UNDER 17 U.S.C. § 512(d) FOR WEB AND	
9	IMAGE SEARCH (Dkt No. 456, filed under seal);	
10	STATEMENT OF UNCONTROVERTED FACTS AND	
11	CONCLUSIONS OF LAW IN SUPPORT OF DEFENDANT	
12	GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT RE:	
13	GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C.	
14	§ 512(d) FOR WEB AND IMAGE SEARCH (filed under seal, see Dkt.	
15	No. 423);	
16	DEFENDANT GOOGLE'S NOTICE OF MOTION AND MOTION	
17	FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT	
18	TO SAFE HARBOR UNDER 17 U.S.C. § 512(c) FOR ITS	
19	BLOGGER SERVICE (Dkt. No. 457, filed under seal);	
20	STATEMENT OF UNCONTROVERTED FACTS AND	
21	CONCLUSIONS OF LAW IN SUPPORT OF DEFENDANT	
22	GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT RE:	
23	GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C.	
24	§ 512(c) FOR ITS BLOGGER SERVICE (filed under seal, see Dkt.	
25	No. 423);	
26	DEFENDANT GOOGLE'S NOTICE OF MOTION AND MOTION	
27	FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT	
28		
01980.51320/3369936.1	-1- GOOGLE'S NOTICE OF LODGING OF MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S	
	ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND SUPPORTING DOCUMENTS	

1	TO SAFE HARBOR UNDER 17 U.S.C. § 512(b) FOR ITS CACHING	
2	FEATURE (Dkt. No. 458, filed under seal);	
3	STATEMENT OF UNCONTROVERTED FACTS AND	
4	CONCLUSIONS OF LAW IN SUPPORT OF DEFENDANT	
5	GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT RE:	
6	ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512(b)	
7	FOR ITS CACHING FEATURE (filed under seal, see Dkt. No. 423);	
8	DECLARATION OF SHANTAL RANDS POOVALA IN SUPPORT	
9	OF DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY	
10	JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR	
11	UNDER 17 U.S.C. § 512, AND DOCUMENTARY AND NON-	
12	DOCUMENTARY EXHIBITS THERETO (Dkt. Nos. 467-469, filed	
13	under seal);	
14	DECLARATION OF PAUL HAAHR IN SUPPORT OF	
15	DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY	
16	JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR	
17	UNDER 17 U.S.C. § 512, AND EXHIBITS THERETO (Dkt. No. 460,	
18	filed under seal);	
19	DECLARATION OF RACHEL HERRICK KASSABIAN IN	
20	SUPPORT OF DEFENDANT GOOGLE'S MOTIONS FOR	
21	SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO	
22	SAFE HARBOR UNDER 17 U.S.C. § 512, AND EXHIBITS	
23	THERETO (Dkt. No. 466, filed under seal);	
24	DECLARATION OF BILL BROUGHER IN SUPPORT OF	
25	DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY	
26	JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR	
27	UNDER 17 U.S.C. § 512 (Dkt. No. 459, filed under seal);	
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01980.51320/3369936.1	-2- GOOGLE'S NOTICE OF LODGING OF MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S	

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1	DECLARATION OF SIBRINA KHAN IN SUPPORT OF	
2	DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY	
3	JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR	
4	UNDER 17 U.S.C. § 512 (Dkt. No. 429);	
5		
6	<b>Google's DMCA Reply Briefs And Supporting Materials</b>	
7	• DEFENDANT GOOGLE'S REPLY IN SUPPORT OF MOTION FOR	
8	SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO	
9	SAFE HARBOR UNDER 17 U.S.C. § 512(d) FOR WEB AND	
10	IMAGE SEARCH (Dkt. No. 529, filed under seal);	
11	DEFENDANT GOOGLE'S CONSOLIDATED SEPARATE	
12	STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF	
13	GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE: SAFE	
14	HARBOR UNDER 17 U.S.C. § 512(d) FOR WEB AND IMAGE	
15	SEARCH (filed under seal, see Dkt. No. 502);	
16	• DEFENDANT GOOGLE'S REPLY IN SUPPORT OF MOTION FOR	
17	SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO	
18	SAFE HARBOR UNDER 17 U.S.C. § 512(c) FOR ITS BLOGGER	
19	SERVICE (Dkt. No. 530, filed under seal);	
20	DEFENDANT GOOGLE'S <u>CORRECTED</u> CONSOLIDATED	
21	SEPARATE STATEMENT OF UNDISPUTED FACTS IN SUPPORT	
22	OF GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE: SAFE	
23	HARBOR UNDER 17 U.S.C. § 512(c) FOR ITS BLOGGER	
24	SERVICE (filed under seal, see Dkt. No. 522);	
25	DEFENDANT GOOGLE INC.'S REPLY IN SUPPORT OF ITS	
26	MOTION FOR SUMMARY JUDGMENT RE: GOOGLE'S	
27	ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512(b)	
28	FOR ITS CACHING FEATURE (Dkt. No. 531, filed under seal);	
01980.51320/3369936.1	-3- GOOGLE'S NOTICE OF LODGING OF MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND SUPPORTING DOCUMENTS	

1	DEFENDANT GOOGLE'S CONSOLIDATED SEPARATE
2	STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF
3	GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE: SAFE
4	HARBOR UNDER 17 U.S.C. § 512(b) FOR ITS CACHING
5	FEATURE (filed under seal, see Dkt. No. 502);
6	REBUTTAL DECLARATION OF SHANTAL RANDS POOVALA
7	IN SUPPORT OF DEFENDANT GOOGLE'S MOTIONS FOR
8	SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO
9	SAFE HARBOR UNDER 17 U.S.C. § 512, AND EXHIBITS
10	THERETO (Dkt. No. 534, filed under seal);
11	REBUTTAL DECLARATION OF BILL BROUGHER IN SUPPORT
12	OF DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY
13	JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR
14	UNDER 17 U.S.C. § 512 (Dkt. No. 533, filed under seal);
15	REBUTTAL DECLARATION OF RACHEL HERRICK
16	KASSABIAN IN SUPPORT OF DEFENDANT GOOGLE'S
17	MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S
18	ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND
19	EXHIBITS THERETO (Dkt. No. 506);
20	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
21	DECLARATION OF SHEENA CHOU IN OPPOSITION TO
22	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE
23	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
24	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 507);
25	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
26	DECLARATION OF SEAN CHUMURA IN OPPOSITION TO
27	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE
28	
01980.51320/3369936.1	-4- GOOGLE'S NOTICE OF LODGING OF MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S
	ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND SUPPORTING DOCUMENTS

1	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
2	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 508);
3	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
4	DECLARATION OF MARGARET JANE EDEN IN OPPOSITION
5	TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT
6	RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
7	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 509);
8	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
9	DECLARATION OF DEAN HOFFMAN IN OPPOSITION TO
10	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE
11	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
12	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 510);
13	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
14	DECLARATION OF JEFFREY MAUSNER IN OPPOSITION TO
15	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE
16	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
17	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 511);
18	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
19	DECLARATION OF BENNETT MCPHATTER IN OPPOSITION TO
20	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE
21	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
22	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 512);
23	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE
24	DECLARATION OF C.J. NEWTON IN OPPOSITION TO
25	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE
26	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,
27	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 513);
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01980.51320/3369936.1	-5- GOOGLE'S NOTICE OF LODGING OF MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S

1	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE	
2	DECLARATION OF DAVID O'CONNOR IN OPPOSITION TO	
3	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE	
4	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,	
5	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 514);	
6	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE	
7	DECLARATION OF LES SCHWARTZ IN OPPOSITION TO	
8	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE	
9	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,	
10	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 515);	
11	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE	
12	DECLARATION OF MELANIE POBLETE IN OPPOSITION TO	
13	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE	
14	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,	
15	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 516);	
16	and	
17	GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE	
18	DECLARATION OF DR. NORMAN ZADA IN OPPOSITION TO	
19	GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE	
20	DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH,	
21	BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 532,	
22	filed under seal).	
23		
24	As noted above, many of these documents contain material that Google	
25	and/or Perfect 10, Inc. has designated Confidential and/or Highly Confidential	
26	pursuant to the Protective Order entered by the Court in this action (Docket No. 94),	
27	and have, accordingly, been filed under seal previously in this action.	
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01980.51320/3369936.1	-6- GOOGLE'S NOTICE OF LODGING OF MOTIONS FOR SUMMARY JUDGMENT RE' GOOGLE'S	

1	DATED: March 15, 2010 OUDDUE	
1 2	SULLIVA	EMANUEL URQUHART & AN, LLP
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4		Achil Henick Kassabian
5		el Herrick Kassabian
6	Attor	meys for Defendant GOOGLE INC.
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01980.51320/3369936.1	-7- GOOGLE'S NOTICE OF LODGING OF MOTIONS FO ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.	OR SUMMARY JUDGMENT RE: GOOGLE'S
	ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.	.C. § 512, AND SUPPORTING DOCUMENTS