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10
 11 UNITED STATES DISTRICT COURT
 12 CENTRAL DISTRICT OF CALIFORNIA

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

16 vs.

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

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

**GOOGLE INC.'S NOTICE OF
 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**

20 AND COUNTERCLAIM

Hon. A. Howard Matz

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

24 vs.

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

Date: April 5, 2010
 Time: 10:00 a.m.
 Ctrm: 14

Discovery Cut-off: None Set
 Pretrial Conference Date: None Set
 Trial Date: None Set

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 **Google’s DMCA Opening Briefs And Supporting Materials**

- 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
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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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- DECLARATION OF SIBRINA KHAN IN SUPPORT OF DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512 (Dkt. No. 429);

Google's DMCA Reply Briefs And Supporting Materials

- DEFENDANT GOOGLE'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512(d) FOR WEB AND IMAGE SEARCH (Dkt. No. 529, filed under seal);
- DEFENDANT GOOGLE'S CONSOLIDATED SEPARATE STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE: SAFE HARBOR UNDER 17 U.S.C. § 512(d) FOR WEB AND IMAGE SEARCH (filed under seal, see Dkt. No. 502);
- DEFENDANT GOOGLE'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512(c) FOR ITS BLOGGER SERVICE (Dkt. No. 530, filed under seal);
- DEFENDANT GOOGLE'S CORRECTED CONSOLIDATED SEPARATE STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF GOOGLE'S MOTION FOR SUMMARY JUDGMENT RE: SAFE HARBOR UNDER 17 U.S.C. § 512(c) FOR ITS BLOGGER SERVICE (filed under seal, see Dkt. No. 522);
- DEFENDANT GOOGLE INC.'S REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512(b) FOR ITS CACHING FEATURE (Dkt. No. 531, filed under seal);

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- DEFENDANT GOOGLE’S CONSOLIDATED SEPARATE STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF GOOGLE’S MOTION FOR SUMMARY JUDGMENT RE: SAFE HARBOR UNDER 17 U.S.C. § 512(b) FOR ITS CACHING FEATURE (filed under seal, see Dkt. No. 502);
- REBUTTAL DECLARATION OF SHANTAL RANDS POOVALA IN SUPPORT OF DEFENDANT GOOGLE’S MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE’S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND EXHIBITS THERETO (Dkt. No. 534, filed under seal);
- REBUTTAL DECLARATION OF BILL BROUGHER IN SUPPORT OF DEFENDANT GOOGLE'S MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE'S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512 (Dkt. No. 533, filed under seal);
- REBUTTAL DECLARATION OF RACHEL HERRICK KASSABIAN IN SUPPORT OF DEFENDANT GOOGLE’S MOTIONS FOR SUMMARY JUDGMENT RE: GOOGLE’S ENTITLEMENT TO SAFE HARBOR UNDER 17 U.S.C. § 512, AND EXHIBITS THERETO (Dkt. No. 506);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF SHEENA CHOU IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 507);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF SEAN CHUMURA IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE

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- DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 508);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF MARGARET JANE EDEN IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 509);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF DEAN HOFFMAN IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 510);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF JEFFREY MAUSNER IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 511);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF BENNETT MCPHATTER IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 512);
- GOOGLE INC.'S EVIDENTIARY OBJECTIONS TO THE DECLARATION OF C.J. NEWTON IN OPPOSITION TO GOOGLE'S THREE MOTIONS FOR SUMMARY JUDGMENT RE DMCA SAFE HARBOR FOR ITS WEB AND IMAGE SEARCH, BLOGGER SERVICE, AND CACHING FEATURE (Dkt. No. 513);

- 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.

1 DATED: March 15, 2010

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By *Rachel Herrick Kassabian*
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Attorneys for Defendant GOOGLE INC.