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16 Attorneys for Defendant
 GOOGLE TECHNOLOGY INC.,
 17 sued under its former name GOOGLE INC.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

22 OVERTURE SERVICES, INC., a
 Delaware Corporation,
 23
 Plaintiff,
 24
 vs.
 25
 26 GOOGLE INC., a California Corporation,
 Defendant.
 27

No. C02-01991 JSW (EDL)
**JOINT MOTION FOR ENTRY OF
 STIPULATED SUPPLEMENTAL
 PROTECTIVE ORDER RE EMAIL
 DISCOVERY MATTER**

1 Plaintiff Overture Services, Inc. ("Overture") and defendant Google Technology,
2 Inc. ("Google") jointly move pursuant to Rule 26(c)(7) of the Federal Rules of Civil
3 Procedure for entry of a supplemental protective order regarding email. The proposed
4 order, to which the parties stipulate, is attached hereto as an exhibit.

5 In light of the volume of email currently used in the normal course of business,
6 and in light of the conventions for electronic storage of such email, the parties recognize
7 and agree that the process of identifying and reviewing email for potential production in
8 response to document requests presents special burdens. Accordingly, the parties
9 agree to adopt and follow the protocol set forth in the attached proposed order
10 governing responses to document requests seeking email in this case.

11
12 Dated: August 11, 2003

BRINKS HOFER GILSON & LIONE

13 By: s/ Charles M. McMahon
14 Charles M. McMahon
15 Attorneys for Plaintiff
OVERTURE SERVICES, INC.

16 Dated: August 11, 2003

KEKER & VAN NEST, LLP

17 By: s/ Michael S. Kwun
18 Michael S. Kwun
19 Attorneys for Defendant
GOOGLE TECHNOLOGY, INC.,
sued under its former name GOOGLE, INC.

20 **DECLARATION OF CHARLES M. MCMAHON**

21 I, Charles M. McMahon, declare that prior to filing the above Joint Motion for
22 Entry of Stipulated Supplemental Protective Order re Email, I sent it to Michael S. Kwun
23 for his review, and he authorized me to file the Joint Motion on his behalf.

24 I declare under penalty of perjury under the laws of the United States of America
25 that the foregoing is true and correct. Executed on this 11th day of August 2003 at
26 Chicago, Illinois.

27 s/ Charles M. McMahon
28 Charles M. McMahon