

1 DOUGLAS E. OLSON (CSB NO. 38649)  
 2 [dougolson@sandiegoiplaw.com](mailto:dougolson@sandiegoiplaw.com)  
 3 JAMES V. FAZIO, III (CSB NO. 183353)  
 4 [jamesfazio@sandiegoiplaw.com](mailto:jamesfazio@sandiegoiplaw.com)  
 5 TREVOR Q. CODDINGTON, PH.D. (CSB NO. 243042)  
 6 [trevorcoddington@sandiegoiplaw.com](mailto:trevorcoddington@sandiegoiplaw.com)  
 7 SAN DIEGO IP LAW GROUP LLP  
 8 12526 High Bluff Drive, Suite 300  
 9 San Diego, CA 92130  
 10 Telephone: (858) 792-3446  
 11 Facsimile: (858) 792-3447

12 Attorneys for Plaintiff  
 13 STREETSPLACE, INC.

14 UNITED STATES DISTRICT COURT  
 15 SOUTHERN DISTRICT OF CALIFORNIA

16 STREETSPLACE, INC., a Delaware  
 17 corporation,

18 Plaintiff,

19 vs.

20 GOOGLE INC., a Delaware corporation;  
 21 ADMOB, INC., a Delaware corporation;  
 22 APPLE INC., a California corporation;  
 23 QUATTRO WIRELESS, INC., a Delaware  
 24 corporation; NOKIA CORPORATION, a  
 25 foreign corporation; NOKIA INC., a  
 26 Delaware corporation; NAVTEQ  
 27 CORPORATION, a Delaware corporation;  
 28 MILLENNIAL MEDIA, INC., a Delaware  
 corporation; JUMPTAP, INC., a Delaware  
 corporation; and DOES 1 through 20,  
 inclusive,

Defendants.

CASE NO. 10-CV-1747-LAB-AJB

**NOTICE OF MOTION AND MOTION  
 BY PLAINTIFF STREETSPLACE, INC.  
 TO DISQUALIFY COUNSEL FOR  
 DEFENDANT MILLENNIAL MEDIA**

Date: March 14, 2011  
 Time: 11:15 a.m.  
 Judge: Hon. Larry A. Burns  
 Ctrm: 9

1 NOTICE IS HEREBY GIVEN that on March 14, 2011, at 11:15 a.m. or as soon thereafter  
2 as the matter may be heard, before the Honorable Larry A. Burns in Courtroom 9 of the above-  
3 entitled court, located at 880 Front Street, San Diego, California 92101, Plaintiff Streetspace, Inc.  
4 (“Streetspace”) will and hereby does respectfully move this Court for an order disqualifying  
5 attorney Chris Campbell and the entire law firm of Cooley LLP from representing Defendant  
6 Millennial Media, Inc. or any party in this matter on the ground that Mr. Campbell is a former  
7 intellectual property partner in the Washington, D.C. office of Hunton & Williams—the same  
8 office of the same firm that prosecuted Streetspace’s patent in this case (U.S. Patent No.  
9 6,847,969 (“the ‘969 patent”)—and was a partner with Hunton & Williams for more than the  
10 same two-plus year period during which Hunton & Williams prosecuted the ‘969 patent to  
11 issuance.

12 The motion is based on this Notice of Motion and Motion, the memorandum of points and  
13 authorities filed concurrently herewith, the Declaration of Trevor Q. Coddington and exhibits  
14 thereto, and on such other and further matters as the Court may consider at or before the hearing  
15 on the motion.

16 Dated: January 28, 2011

SAN DIEGO IP LAW GROUP LLP

17  
18 By: /s/James V. Fazio, III

DOUGLAS E. OLSON  
JAMES V. FAZIO, III  
TREVOR Q. CODDINGTON, PH.D.

19  
20  
21 Attorneys for Plaintiff  
STREETSPACE, INC.

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, certify and declare that I am over the age of 18 years old, employed in  
3 the County of San Diego, State of California, and am not a party to the above-entitled action.

4 On January 28, 2011, I filed a copy of the following documents:

5 **NOTICE OF MOTION AND MOTION BY PLAINTIFF STREETSPACE, INC. TO  
6 DISQUALIFY COUNSEL FOR DEFENDANT MILLENNIAL MEDIA**

7 **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF THE MOTION  
8 BY PLAINTIFF STREETSPACE, INC. TO DISQUALIFY COUNSEL FOR DEFENDANT  
9 MILLENNIAL MEDIA**

10 **DECLARATION OF TREVOR Q. CODDINGTON IN SUPPORT OF THE MOTION BY  
11 STREETSPACE, INC. TO DISQUALIFY COUNSEL FOR MILLENNIAL MEDIA**

12 by electronically filing with the Clerk of the Court using the CM/ECF system, which will send  
13 notification of such filing to the following email addresses:

14 **John S. Kyle**  
15 Cooley LLP  
16 Email: [jkyle@cooley.com](mailto:jkyle@cooley.com)

17 **Frank V. Pietrantonio**  
18 Cooley LLP  
19 Email: [fpietrantonio@cooley.com](mailto:fpietrantonio@cooley.com)

20 **Christopher C. Campbell**  
21 Cooley LLP  
22 Email: [ccampbell@cooley.com](mailto:ccampbell@cooley.com)

23 **George A. Riley**  
24 O'Melveny & Myers LLP  
25 Email: [griley@omm.com](mailto:griley@omm.com)

26 **Luann L. Simmons**  
27 O'Melveny & Myers LLP  
28 Email: [lsimmons@omm.com](mailto:lsimmons@omm.com)

**Anne E. Huffsmith**  
O'Melveny & Myers LLP  
Email: [ahuffsmith@omm.com](mailto:ahuffsmith@omm.com)

**Shawn E. McDonald**  
Foley & Lardner LLP  
Email: [semcdonald@foley.com](mailto:semcdonald@foley.com)

**Matthew B. Lowrie**  
Foley & Lardner LLP  
Email: [mlowrie@foley.com](mailto:mlowrie@foley.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Justin E. Gray**  
Foley & Lardner LLP  
Email: [jegray@foley.com](mailto:jegray@foley.com)

**Kurt M. Kjelland**  
Goodwin Procter LLP  
Email: [kkjelland@goodwinprocter.com](mailto:kkjelland@goodwinprocter.com)

**David Hessel Ben-Meir**  
Alston & Bird LLP  
[david.ben-meir@alston.com](mailto:david.ben-meir@alston.com)

I hereby certify and declare, under the penalty of perjury, under the laws of the United States and of the State of California, that the foregoing is true and correct.

Executed on this 28<sup>th</sup> day of January 2011, at San Diego, California.

By: /s/ James V. Fazio, III  
James V. Fazio, III