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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN JOSE DIVISION

13 DIGITAL ENVOY, INC.,)
 14)
 15 Plaintiff/Counterdefendant,)
 16)
 17 v.)
 18)
 19 GOOGLE INC.,)
 20)
 21 Defendant/Counterclaimant.)
 22)
 23)
 24)
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 26)
 27)
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CASE NO.: C 04 01497 RS
**[PROPOSED] ORDER GRANTING
 GOOGLE INC.'S MOTION FOR
 ENTRY OF A PROTECTIVE
 ORDER STAGING DISCOVERY**
 Judge: Hon. Richard Seeborg
 Courtroom: 4, 5th Floor
 Date: September 22, 2004
 Time: 9:00 a.m.

1 Defendant and counterclaimant Google Inc. ("Google") has filed a motion for entry of a
2 protective order staging discovery in this case.

3 After considering the papers filed in connection with the motion and all other matters
4 presented to the Court, and good cause appearing therefore,

5 IT IS HEREBY ORDERED THAT:

6 1. Discovery proceedings in the case shall be staged.

7 2. All discovery other than that directed to the negotiation and interpretation of the
8 parties' November 2000 Agreement, including but not limited to discovery regarding Google's
9 alleged use of Digital Envoy's technology, Google's finances, advertisers and business plans, is
10 stayed pending further order of the Court.

11 3. This Order is subject to modification for good cause shown.

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13 Dated: _____, 2004.

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Honorable Richard Seeborg
United States District Magistrate Judge

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