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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

11 KINDERSTART.COM LLC, a California  
 12 limited liability company, on behalf of itself and  
 all others similarly situated,

13 Plaintiffs,

14 v.

15 GOOGLE, INC., a Delaware corporation,

16 Defendant.

Case No. C 06-2057 JF

**[PROPOSED] ORDER RE SPECIFIED  
 DISCOVERY BY PLAINTIFF ON  
 DEFAMATION AND LIBEL COUNT**

17 Having considered Plaintiff KinderStart.com LLC's motion for discovery prior to the  
 18 adjudication of Defendant Google's Special Motion to Strike pursuant to California Code of  
 19 Civil Procedure section 425.16, any opposition thereto, and all other documents and pleadings  
 20 on file as well as argument and evidence presented at the hearing on this motion,

21 IT IS HEREBY ORDERED THAT Plaintiff's be permitted to conduct specified  
 22 discovery limited to those subject matters on the attached list, under oversight of the Magistrate  
 23 Judge. No discovery by Plaintiff beyond \_\_\_\_\_, 2006 will be permitted without leave  
 24 of court. The Magistrate Judge will address and adjudicate any discovery issues and disputes  
 25 between the parties in this regard.

27 Dated: \_\_\_\_\_, 2006

By: \_\_\_\_\_  
 The Honorable Jeremy Fogel

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**Specified Discovery Plan for Plaintiff KinderStart.com LLC regarding Defendant Google**

1. The actual frequency and times when PageRank for www.kinderstart.com was internally calculated and recalculated during the period January 1, 2005 to May 31, 2006;
2. The actual frequency and times when PageRank for www.kinderstart.com was presented for viewing over the Internet from January 1, 2005 to May 31, 2006;
3. Source code, specifications, schematics, flow charts, artwork, formulas, or other internal documentation sufficient to show the operations of any and all aspects and elements of PageRank;
4. Any internal prepared engineering, mathematical or statistical analyses, white papers or specifications relating to the formulation or calculation of PageRank, including without limitation engineering design and scientific or statistical modeling using Markov analysis;
5. Quantitative listing of backlinks as prepared by Google for www.kinderstart.com at all relevant times;
6. Raw quantitative inputs for the PageRank as prepared and used by Google for www.kinderstart.com at all relevant times;
7. All human, qualitative, or subjective factors, if any, that impinged, directly or indirectly, on PageRank that resulted in a '0' Page Rank for www.kinderstart.com, at all relevant times; and
8. All factors, methods, algorithms or other means by which a Website on the Internet may receive an assigned PageRank of '0' by Google.