Levitte v. Google Inc. Doc. 14 Att.

EXHIBIT 4

Norton, Leo

From:

Norton, Leo

Sent:

Tuesday, September 02, 2008 8:11 AM

To:

'rschubert@schubertlawfirm.com'; 'KKralowec@schubertlawfirm.com'; 'guido@saveri.com';

'rick@saveri.com'; 'cadio@saveri.com'; 'terry@gba-law.com'; 'adam@gba-law.com'; 'monique@gba-law.com'; 'eriksyverson@gmail.com'; 'bsk@kbklawyers.com'; 'rlk@kbklawyers.com'; 'at@kbklawyers.com'; 'wjonckheer@schubertlawfirm.com'

Rhodes, Michael; Willsey, Peter; 'ddurie@kvn.com'

Cc: Subject:

Re: Google AdWords N.D. Cal. Cases - Letter from Cooley to Plaintiffs' Counsel

We did not receive a response on Thursday as stated in the email below, and it has been over a week since we sent our letter. If we do not receive a response by noon today, we will file the administrative motion to relate the N.D. Cal. cases today, and advise the court (as we are required to do under the local rules) that we attempted to reach a stipulation with plaintiffs regarding relating the cases, but plaintiffs failed to respond.

Please also advise whether plaintiffs agree to coordinating and extending Google's deadline to respond to September 30.

Sincerely,

----Original Message-----

From: Robert C. Schubert

To: Leo Norton

To: Kimberly A. Kralowec

To: guido@saveri.com

To: rick@saveri.com

To: cadio@saveri.com
To: terry@gba-law.com

To: adam@gba-law.com

To: monique@gba-law.com

To: eriksyverson@gmail.com

To: bsk@kbklawyers.com

To: rlk@kbklawyers.com

To: at@kbklawyers.com

To: Willem F. Jonckheer

Cc: Michael Rhodes

Cc: Willsey, Peter

Cc: ddurie@kvn.com

Sent: Aug 26, 2008 1:00 PM

Subject: RE: Google AdWords N.D. Cal. Cases - Letter from Cooley to Plaintiffs' Counsel

The attorneys in the CA cases will be discussing the issues you raise and expect to get back to you by Thursday at the latest.

From: Norton, Leo [mailto:lnorton@cooley.com]

Sent: Tuesday, August 26, 2008 12:19 PM

To: Kimberly A. Kralowec; guido@saveri.com; rick@saveri.com; cadio@saveri.com; terry@gba-

law.com; adam@gba-law.com; monique@gba-law.com; eriksyverson@gmail.com;

bsk@kbklawyers.com; rlk@kbklawyers.com; at@kbklawyers.com; Robert C. Schubert; Willem F.

Jonckheer

Cc: Rhodes, Michael; Willsey, Peter; ddurie@kvn.com

Subject: RE: Google AdWords N.D. Cal. Cases - Letter from Cooley to Plaintiffs' Counsel

Ms. Kralowec:

Thank you for your prompt response. We are fine with September 3 for plaintiffs' response to our letter regarding relating the cases.

As for coordinating Google's response deadline and requested extension of time, we request that all plaintiffs' agree to coordinate and extend Google's response to September 30. Although we appreciate you agreeing to a further extension of time in your case (the Levitte case) until September 10, such an extension does not result in a coordinated response deadline. The deadline to respond in the Pulaski case is September 4. Additionally, Google was recently served with another AdWords parked domain and error page websites putative class action. That case is pending in the N.D. Ill., and has a mid-September response date. We are attempting to get plaintiff in that action to voluntarily dismiss

-----Original Message Truncated-----

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Bio: www.cooley.com/lnorton Practice: www.cooley.com/litigation