
Exhibit A

BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION

IN RE: GOOGLE WIFI LITIGATION

MDL Docket No. _____

MOTION OF GOOGLE INC. FOR TRANSFER OF ACTIONS TO THE NORTHERN
DISTRICT OF CALIFORNIA PURSUANT TO 28 U.S.C. § 1407 FOR COORDINATED
OR CONSOLIDATED PRETRIAL PROCEEDINGS

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Defendant Google Inc. respectfully moves this Panel for an order, pursuant to 28 U.S.C. § 1407 and Rule 7.2 of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, transferring the actions identified in the attached Schedule of Actions, as well as all subsequently filed related actions, to the United States District Court for the Northern District of California, for coordinated or consolidated pretrial proceedings.

In support of its Motion, and as more fully articulated in the accompanying Brief, Google states:

1. The actions identified in the attached Schedule of Actions (the "Google WiFi Cases") have been filed by the plaintiffs and are pending in the districts indicated in the Schedule.
2. To date, plaintiffs have filed eight Google WiFi Cases. The cases are pending in the United States District Courts for the Northern District of California (two cases); the District of Oregon; the Southern District of Illinois; the District of Massachusetts; the Eastern District of Pennsylvania; and the District of Columbia (two cases). (A case has been filed in the Central District of California that is likely a ninth such case, but Google has not seen the complaint.)
3. Plaintiffs in six of the Google WiFi Cases purport to represent nationwide classes of aggrieved individuals.
4. Google is the lone defendant in each case.
5. Google's principal place of business and headquarters are located in Mountain View, California, which is in the Northern District of California.
6. Google believes that most of the likely witnesses and relevant documents are located in the Northern District of California.

7. All of the complaints in the Google WiFi Cases assert claims under the federal Wiretap Act, 18 U.S.C. § 2511 et seq. Some cases involve other, similar claims, including state law claims subject to preemption arguments under federal law.

8. All of the complaints make very similar factual allegations, and thus any necessary discovery will be of common facts.

9. In accordance with 28 U.S.C. § 1407, the transfer and coordination or consolidation of the Google WiFi Cases will serve the convenience of the parties, witnesses, counsel, and the judicial system.

10. Absent pretrial coordination or consolidation, the possibility of inconsistent pretrial rulings exists, especially with respect to the proper scope and extent of discovery, class certification, and other factual and legal matters.

11. Given the procedural posture of the Google WiFi Cases, no judicial resources will be wasted if these cases are transferred.

12. Three of the Google WiFi Cases are pending in the Ninth Circuit, and two are pending in the Northern District of California.

WHEREFORE, for the reasons stated herein and in the accompanying Brief, Google respectfully requests that the Panel issue an order transferring all actions listed in the attached Schedule of Actions, as well as all subsequently filed related actions, to the United States District Court for the Northern District of California, for coordinated or consolidated pretrial proceedings.

Dated this 8th day of June, 2010.

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