

Google Wi-Fi Cases, as well as all subsequently-filed related actions, to the United States District Court for the District of Columbia for coordinated or consolidated pretrial proceedings.

5. The *Keyes* plaintiffs' motion for transfer of actions and for coordinated or consolidated pretrial proceedings remains pending before the JPML.

6. Google agrees with the *Keyes* plaintiffs that the cases should be consolidated but will ask the Panel to transfer the Google Wi-Fi Cases, 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.

WHEREFORE, Google respectfully moves that:

1. All pretrial deadlines shall be stayed pending the JPML's resolution of whether the Google Wi-Fi cases, and all subsequently-filed related actions, should be transferred to a single judicial district for coordinated or consolidated pretrial proceedings.

2. In the event that the JPML denies transfer of the Google Wi-Fi cases, and all subsequently-filed related actions, to a single judicial district for coordinated or consolidated pretrial proceedings, Google shall have thirty days from the date of the order denying transfer to plead, answer, move, or otherwise respond to plaintiffs' class action complaint.

3. In the event that the JPML orders the transfer of the Google Wi-Fi cases, and all subsequently-filed related actions, to a single judicial district for coordinated or consolidated pretrial proceedings, Google shall plead, answer, move, or otherwise

respond to plaintiffs' class action complaint within thirty days from (a) the date that plaintiffs file a master consolidated complaint in the transferee district or (b) the date that it is resolved by the transferee court and/or counsel for plaintiffs and Google that no master consolidated complaint will be filed.

GOOGLE INC.,
By its attorneys,

/s/ James B. Conroy
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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, I hereby certify as follows:

1. On Tuesday, June 22, I sent to plaintiff's counsel by email a copy of a stipulation that the parties in similar cases now pending in other judicial districts have entered into, substantively identical to the relief sought in the foregoing motion, and asked him to review and consider it and telephone me to discuss the prospect of submitting it in this case as a joint motion.
2. On Thursday, June 24, I had two brief telephone conversations with plaintiff's counsel in which he neither agreed to enter into such a motion nor declined to do so.
3. On Friday, June 25, I left plaintiff's counsel a follow-up voice mail message asking for a response. I received no reply.
4. On Monday, June 28, I sent plaintiff's counsel an email, again asking for a response and reminding him that the existing deadline to respond to his complaint would fall on the next day, today. I received no reply.

5. As of this writing, at mid-day on Tuesday, June 29, I have heard nothing further from plaintiff's counsel.

/s/ James B. Conroy
James B. Conroy

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing. The ECF system presently indicates that there are no non-registered participants.

/s/ James B. Conroy
James B. Conroy