

1 Margret M. Caruso (SBN 243473)
 Cheryl A. Galvin (SBN 252262)
 2 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 555 Twin Dolphin Drive, 5th Floor
 3 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 4 Facsimile: (650) 801-5100

5 Attorneys for Defendant
 GOOGLE INC.

6 Andrew D. Skale (SBN 211096)
 askale@mintz.com
 Ben L. Wagner (SBN 243594)
 bwagner@mintz.com
 Justin S. Nahama (SBN 281087)
 jsnahama@mintz.com
 9 MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.
 10 3580 Carmel Mountain Road, Suite 300
 San Diego, CA 92130
 Telephone: (858) 314-1500
 11 Facsimile: (858) 314-1501

12 Attorneys for Plaintiff
 13 HANGINOUT, INC.

14
 15 UNITED STATES DISTRICT COURT
 16 SOUTHERN DISTRICT OF CALIFORNIA
 17

18 HANGINOUT, INC., a Delaware
 corporation,

19 Plaintiff,

20 vs.

21 GOOGLE, INC., a Delaware
 22 corporation,

23 Defendant.

Case No. 3:13-cv-02811-AJB-NLS

**JOINT MOTION FOR PROTECTIVE
 ORDER AND ESI PROTOCOL**

1 WHEREAS, Hanginout, Inc. (“Hanginout”) and Google Inc. (“Google”) seek
2 to expedite the production of discovery material, facilitate the prompt resolution of
3 disputes over confidentiality of discovery material, and adequately protect
4 information the parties are entitled to keep confidential;

5 WHEREAS, Hanginout and Google have jointly agreed to a proposed
6 protective order;

7 WHEREAS, Hanginout and Google have jointly agreed to a proposed ESI
8 protocol;

9 NOW THEREFORE, THE PARTIES JOINTLY MOVE and respectfully
10 request that the Court enter the proposed protective order and proposed ESI protocol.

11 Dated: September 10, 2014

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

12
13
14 By: /s/ Margret M. Caruso
Margret M. Caruso

15 Attorneys for Defendant
16 GOOGLE INC.

17
18 Dated: September 10, 2014

MINTZ LEVIN COHN FERRIS GLOVSKY
AND POPEO PC

19
20 By: /s/ Ben Wagner
Ben Wagner

21 Attorneys for Plaintiff
22 HANGINOUT, INC.

1 **SIGNATURE CERTIFICATION**

2 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
3 Policies and Procedures Manual, I hereby certify that the content of this document is
4 acceptable to Ben Wagner, counsel for Plaintiff Hanginout, Inc., and that Mr.
5 Wagner's authorization has been obtained to affix his electronic signature to this
6 document.

7
8 Dated: September 10, 2014

By /s/Margret M. Caruso
Margret M. Caruso

9
10
11 Attorneys for Defendant
GOOGLE INC.
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28