IN THE UNITED STATES COURT OF FEDERAL CLAIMS BID PROTEST

| GOOGLE, INC. |) |
|-----------------------------|---|
| and |) |
| ONIX NETWORKING CORPORATION |) |
| |) |
| Plaintiffs, |) |
| V. |) |
| THE UNITED STATES, |) |
| Defendant. |) |
| |) |

No. 10-743C

(Judge Braden)

DEFENDANT'S CONSENT MOTION FOR A PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Rules of the United States Court of Federal Claims, defendant respectfully requests that this Court enter the accompanying proposed protective order prohibiting the disclosure of confidential source selection matters, sensitive plans or specifications, and other proprietary information in accordance with the terms and conditions set forth in the proposed protective order. Counsel for plaintiffs has represented that plaintiffs do not oppose this motion.

For the foregoing reasons, defendant respectfully requests that this Court issue the attached proposed protective order.

Respectfully submitted,

TONY WEST Assistant Attorney General

MICHAEL F. HERTZ Deputy Assistant Attorney General OF COUNSEL CHARLES M. KERSTEN Trial Attorney Commercial Litigation Branch Civil Division Department of Justice

SHERYL RAKESTRAW Attorney Advisor Department of the Interior

November 5, 2010

s/ Kirk T. Manhardt KIRK T. MANHARDT Assistant Director

s/ Christopher L. Krafchek CHRISTOPHER L. KRAFCHEK Trial Attorney Commercial Litigation Branch Civil Division Department of Justice 1100 L Street, N.W. Washington, D.C. 20005 Tel: (202) 305-0041 Fax: (202) 305-7644

Attorneys for Defendant

CERTIFICATE OF FILING

I hereby certify that on this 5th day of November, 2010, a copy of the foregoing "DEFENDANT'S CONSENT MOTION FOR A PROTECTIVE ORDER" was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Christopher L. Krafchek