# EXHIBIT A

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May 27, 2009

#### Sent Via-Electronic Mail

Defense Counsel of Record

Re: Vulcan Golf, LLC., et al. v. Google, Inc. et al.

Case No.: 07-CV-3371

Dear Folks:

In response to Google's Motion to Limit Discovery and For Scheduling Order, which has been joined by the remaining Defendants, Plaintiffs would offer the following compromise:

- 1) Agreement to stay all non-ACPA related discovery;
- 2) Complete all ACPA discovery within 90 -120 days;
- 3) Summary Judgment Motions to be filed thereafter by any party who desires to do so; and
- 4) Discovery remains stayed on all non-ACPA claims pending resolution of any Motions for Summary Judgment.

This appears to be a fair resolution that would address your concerns and would alleviate our concerns about being presented with a Motion for Summary Judgment while at the same time conducting discovery for the first time on a short schedule on issues that we believe are somewhat more complicated than as outlined in your Motion.

Your prompt response would be appreciated as our response is due Friday.

Defense Counsel of Record

May 27, 2009 Page 2 of 3

Very truly yours,

Robert M. Foote, Esq.

FOOTE, MEYERS, MIELKE & FLOWERS, LLC

RMF:ms

Defense Counsel of Record May 27, 2009 Page 2 of 3

## **SERVICE LIST**

Vulcan Golf, LLC., et al. v. Google, Inc., et al. Case No.: 07 CV 3371

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May 27, 2009

#### Sent Via-1st Class U.S. Mail and E-mail

Michael H. Page Durie Tangri Page Lemley Roberts & Kent LLP 332 Pine Street. Suite 200 San Francisco, CA 94104 mpage@durietangri.com

Re: Vulcan Golf, LLC., et al. v. Google, Inc. et al.

Case No.: 07-CV-3371

#### Dear Mike:

In response to Google's Motion to Limit Discovery and For Scheduling Order, which has been joined by the remaining Defendants, Plaintiffs would offer the following compromise:

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Your prompt response would be appreciated as our response is due Friday.

Michael H. Page, Esq. May 27, 2009 Page 2 of 2

Very truly yours,

Robert M. Foote, Esq.

FOOTE, MEXERS, MIELKE & FLOWERS, LLC

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