IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ILLINOIS COMPUTER RESEARCH, LLC, Plaintiff and Counterclaim Defendant,)
v.)) No. 07 C 5081
FISH & RICHARDSON P.C., Defendant, Counterclaimant, Third- Party Plaintiff, and Counterclaim Defendant,	Judge Rebecca R. Pallmeyer Magistrate Judge Maria Valdez
v.)
SCOTT C. HARRIS,)
Third-Party Defendant and)
Counterclaimant)

FISH & RICHARDSON P.C.'S RENEWED MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Fish & Richardson, PC, by its attorneys, respectfully moves this Court under Rule 37 of the Federal Rules of Civil Procedure and Rule 37.2 of the Local Rules of the United States District Court for the Northern District of Illinois, and for the reasons set forth more fully in Fish & Richardson's Memorandum in Support of its Renewed Motion to Compel Production of Documents, a copy of which is filed simultaneously and incorporated herein, for an Order compelling Scott Harris and Illinois Computer Research, LLC ("ICR") to:

- 1. Produce immediately any agreement that reflects the formation of an attorneyclient relationship between the Niro firm and Mr. Harris, ICR, or any other party asserting an interest in any of the Harris-related patents (Expedited Discovery Request No. 5, the "Retention and Fee Agreements");
- 2. Produce immediately all documents created while Mr. Harris was at Fish & Richardson, relating to the possible assertion of the Harris-related patents against any entity that was then a Fish & Richardson client (Expedited Discovery Request No. 6, the "Targeting of Clients Documents"), including but not limited to all documents listed on Mr. Harris's and ICR's February 18 privilege log, as amended on February 29. At the same time, ICR and Mr. Harris should expand the scope of their document collection efforts as detailed in the accompanying memorandum of law;

3. At the very least, immediately further amend the February 29 privilege log to include sufficient detail to establish privilege over the withheld documents, if any privilege exists.

In support of this Renewed Motion, Fish & Richardson submits an accompanying memorandum of law.

Dated: February 29, 2008 Respectfully submitted,

FISH & RICHARDSON P.C.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed with the Court by means of the Court's CM/ECF system, which will send notification of such filing to the following counsel at their email address on file with the Court:

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February 29, 2008.

s/David J. Bradford

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